

ATTACHMENT A

Maria, David (USAMN) 1

From: Maria, David (USAMN) 1
Sent: Friday, March 18, 2016 3:33 PM
To: Beulke, Kurt (MP) (FBI); Kokkinen, John (USAMN)
Cc: Khan, Jennifer L. (MP) (FBI)
Subject: RE: Apollo/Scio emails

We still have to figure out a few logistics.

Because of the size of the database, it is going to have to be housed in Relativity at the LTSC instead of loaded into Eclipse here. Unfortunately, that can be a lengthy process. My guess is that there will be nothing available for us to review until the week after next, and possibly the week after that. This sucks, but we don't have an alternative.

Once it is loaded in Relativity, we plan on running a list of search terms to determine the universe of potentially privileged documents. If the search results in a manageable number of documents, that is the universe that you will review. If there are too many hits, we will back up and first do a relevance search and follow that with the same privilege search, which will result in smaller universe.

Short answer is that, once we have a database of documents for you to review, it should not be too many documents. For planning purposes, I'm guessing that you won't have anything to review for at least 2-3 weeks. We'll keep you updated along the way as to timing, but I don't think that you need to set aside too much time.

John – you disagree with any of this?

From: Beulke, Kurt (MP) (FBI) [mailto:Kurt.Beulke@ic.fbi.gov]
Sent: Friday, March 18, 2016 3:13 PM
To: Kokkinen, John (USAMN); Maria, David (USAMN) 1
Cc: Khan, Jennifer L. (MP) (FBI)
Subject: RE: Apollo/Scio emails

Hey guys,

Any insight you could provide on the potential time commitment and expectations of the taint review prior to its commencement would be appreciated as well. I'm mostly curious for planning/scheduling purposes.

Have a great weekend.

Thanks,
Kurt

Kurt Beulke | FBI Special Agent | Minneapolis Office
Phone: 763.569.8362 | Email: kurt.beulke@ic.fbi.gov

From: Khan, Jennifer L. (MP) (FBI)
Sent: Friday, March 18, 2016 2:37 PM
To: Kokkinen, John (USAMN) <John.Kokkinen@usdoj.gov>; Maria, David (USAMN) 1 <David.Maria@usdoj.gov>

Cc: cakroells@uspis.gov; Belich, Brandon (USASPC) <Brandon.Belich@usdoj.gov>; Beulke, Kurt (MP) (FBI) <Kurt.Beulke@ic.fbi.gov>

Subject: Apollo/Scio emails

John and David,

SA Kurt Beulke from my squad has kindly agreed to be part of the email review team. Please let him know when you're ready to start the process. I've included him on this email. Thanks!

SA Jennifer L Khan
Minneapolis FBI-St Paul RA
C-2 Squad
651-228-4249-desk

Maria, David (USAMN) 1

From: Maria, David (USAMN) 1
Sent: Thursday, April 14, 2016 8:45 AM
To: Kokkinen, John (USAMN)
Subject: ADAMS - Search Terms for Privilege Filter.docx

Here is my initial cut at a list of search terms that could be used to filter the potentially privileged documents in the email database. Once you've reviewed, let me know, and we can shoot to Tim for his input.



SEARCH TERMS TO ISOLATE POTENTIALLY PRIVILEGED DOCUMENTS

ADAMS/MONAHAN

[AS OF 4/14/2016]

General Terms

privilege!
attorney
lawyer
advice
counsel
acp
“work product”
“law firm”

Terms related to law firms used by Apollo/ADGC/Adams

adamsmonahan
adamsgrumbles
sankovitz
amllp
wc.com
merchantgould
zouvas
dorsey
“K&L”
klgates
schwegman
slwip
Fredrikson
fredlaw
anthonyostlund
Kopecky
ksblegal
latham
watkins
lw.com
Sikora

Maria, David (USAMN) 1

From: Maria, David (USAMN) 1
Sent: Tuesday, April 26, 2016 2:15 PM
To: Rank, Timothy (USAMN); Kokkinen, John (USAMN)
Subject: Adams Privilege/Taint Review

Dan ran the search terms, and the "general" search terms ("privilege!", "attorney," etc.) were hitting on 70-80% of the documents, due in large part to standard disclaimers that appeared on many/most of the emails.

The more specific terms also had a substantial amount of hits. The specific terms used and the number of each are set forth below:

TERM	Doc Hits
adamsgrumbles	1,495
adamsmonahan	8,003
amllp	1,733
anthonyostlund	15
dorsey	2,438
fredlaw	89
fredrikson	633
K&L	174
klgates	34
kopecky	306
ksblegal	328
latham	3,968
lw.com	3,134
merchantgould	94
sankovitz	1,299
schwegman	1,531
sikora	736
slwip	1,394
watkins	3,604
wc.com	96
zouvas	1,006
Total	32,110

Because our specific search term list was comprehensive, I believe that we are okay just sticking with these terms and dispensing with the general terms. My suggestion would be to segregate/eliminate from our review all of the documents that hit on all of the specific search terms except for "adamsmonahan," "adamsgrumbles," "amllp," and "zouvas," as they were all firms that performed legal work for Apollo/Scio, or are firms that have assisted in defending Adams and Monahan in connection with the SEC action (and our investigation). We would then have the taint team review these approx. 12,000 documents for privilege, releasing to us those that are determined not to be privileged. If we think that 12,00 docs are too many for the taint team to review, we can come up with "relevance search terms" to cull this down to a more manageable number.

Thoughts on this? If everyone is good with this approach, we should be able to open up for review the database with the documents that did not hit on these search terms.

Obviously, this will be an ongoing process to identify potentially relevant documents, and, if we see additional firms or lawyers show up in the emails, we can run searches to segregate these documents.

Maria, David (USAMN) 1

From: Maria, David (USAMN) 1
Sent: Wednesday, April 27, 2016 10:10 AM
To: Belich Brandon J; Kroells, Christine A; Khan, Jennifer L. (MP) (FBI)
Cc: Kokkinen, John (USAMN)
Subject: Scio Update

All,

Two things:

1. We have run search terms on the email database to try to segregate potentially privileged documents. We are still trying to refine the database that contains the potentially privileged docs, but the good news is that the larger database should be available for our review very soon. Once it is ready and available, I will let everyone know. Does everyone have access to Relativity? If not, let me know, and I can let you know what you need to get a logon, etc.
- 2.

Call me if you want additional details or have any questions.

Maria, David (USAMN) 1

From: Maria, David (USAMN) 1
Sent: Wednesday, April 27, 2016 12:47 PM
To: McConville, Daniel (USAMN)
Cc: Czapko, Daniel (USAMN)
Subject: Relativity database

Dan and Dan—

For the Edward Adams/Monahan (aka Scio Diamond, aka Apollo Diamond) project, the following agents will need access to the database in Relativity:

Brandon Belich (IRS)
Jennifer Khan (FBI)
Kristy Kroells (Postal)

Thanks,
David

Maria, David (USAMN) 1

From: Maria, David (USAMN) 1
Sent: Thursday, May 05, 2016 10:46 AM
To: Kroells, Christine A
Cc: Belich Brandon J; Khan, Jennifer L. (MP) (FBI); Kokkinen, John (USAMN)
Subject: RE: Update

Just checked on this -- he is adding access for all of you.

-----Original Message-----

From: Kroells, Christine A [mailto:CAKroells@uspis.gov]
Sent: Thursday, May 05, 2016 10:44 AM
To: Maria, David (USAMN) 1
Cc: Belich Brandon J; Khan, Jennifer L. (MP) (FBI); Kokkinen, John (USAMN)
Subject: Re: Update

I don't see an "Adams 2" folder in Relativity. Am I doing something wrong? I see an "adams_01" folder but we had that before.

Christie Kroells
Sent from my iPhone

On May 4, 2016, at 12:52 PM, Maria, David (USAMN) 1 <David.Maria@usdoj.gov<mailto:David.Maria@usdoj.gov>> wrote:

All,

Also, the email database is up and ready for review in Relativity. It is the "Adams 2" database. Per our searches, the potentially privileged docs have been pulled and stored in a separate database, which should not show up on your Relativity screens. That being said, if you identify other law firms or lawyers in your review of the database with whom any of our folks appear to have an attorney-client relationship, make sure to flag it, and we can run supplemental searches to segregate these documents.

Call me with any questions.

Thanks,
David

Maria, David (USAMN) 1

From: Maria, David (USAMN) 1
Sent: Thursday, May 05, 2016 11:19 AM
To: Czapko, Daniel (USAMN)
Cc: Khan, Jennifer L. (MP) (FBI); CAKroells@uspis.gov; brandon.belich@ci.irs.gov
Subject: RE: Relativity database

Thanks Dan.

From: Czapko, Daniel (USAMN)
Sent: Thursday, May 05, 2016 11:18 AM
To: Maria, David (USAMN) 1
Cc: Khan, Jennifer L. (MP) (FBI); CAKroells@uspis.gov; brandon.belich@ci.irs.gov
Subject: RE: Relativity database

David,

Jennifer and Christine have been added. They should see it the next time they log into Relativity.
Brandon should already have access. Let me know if he can't see it.

Thanks,
Dan C.

From: Maria, David (USAMN) 1
Sent: Wednesday, April 27, 2016 12:47 PM
To: McConville, Daniel (USAMN)
Cc: Czapko, Daniel (USAMN)
Subject: Relativity database

Dan and Dan—

For the Edward Adams/Monahan (aka Scio Diamond, aka Apollo Diamond) project, the following agents will need access to the database in Relativity:

Brandon Belich (IRS)
Jennifer Khan (FBI)
Kristy Kroells (Postal)

Thanks,
David

Maria, David (USAMN) 1

From: Kroells, Christine A <CAKroells@uspis.gov>
Sent: Monday, May 16, 2016 12:06 PM
To: Maria, David (USAMN) 1; Kokkinen, John (USAMN)
Cc: Khan, Jennifer L. (MP) (FBI); Belich Brandon J
Subject: Scio Emails - Privileged

In going through the emails, I've come across the following email addresses that appear to contain privileged communications:

@arnstein.com

@felhaber.com

Also, are we allowed to look at the communications Adams et al had with Bland-Richter regarding the Scio v. Nelson Mullins lawsuit?

Christie Kroells
Postal Inspector | U.S. Postal Inspection Service | Twin Cities Field Office
7360 Bush Lake Rd., Ste. 100, Minneapolis, MN 55439
Office: 612-884-7877
<https://postalinspectors.uspis.gov/>

From: Maria, David (USAMN) 1 </O=USA/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A63F46EF56FF4831A47CE93C0A5F3011-
CASE 0:17-cr-00064-DWF-KMM Document 66-1 Filed 12/13/17 Page 13 of 129
MARIA, DAVID (USAMN)>
Sent: Monday, May 16, 2016 12:30 PM
To: Kroells, Christine A; Kokkinen, John (USAMN)
Cc: Khan, Jennifer L. (MP) (FBI); Belich Brandon J
Subject: RE: Scio Emails - Privileged

I also saw that Hopeman had done some work for him before, so we need to add Hopeman, as well as the "@felhaber" that you note below.

Additionally, it looks like he had a guy working on his tax issues – Tom Brever. We will add Brever as well as @fosterbrever.com. He also had a civil litigation matter with Tamburino from Caplinlaw. He may have been opposing counsel, but it is not relevant for our purposes, so we will add those also.

We need to do a little research on our end, as well as have a conversation with Scio's current counsel, to figure out some of the issues like he Bland-Richter one. I'm assuming that we will be able to review those materials though, as they already turned over the Nelson Mullins report, etc.

From: Kroells, Christine A [mailto:CAKroells@uspis.gov]
Sent: Monday, May 16, 2016 12:06 PM
To: Maria, David (USAMN) 1; Kokkinen, John (USAMN)
Cc: Khan, Jennifer L. (MP) (FBI); Belich Brandon J
Subject: Scio Emails - Privileged

In going through the emails, I've come across the following email addresses that appear to contain privileged communications:

@arnstein.com
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Also, are we allowed to look at the communications Adams et al had with Bland-Richter regarding the Scio v. Nelson Mullins lawsuit?

Christie Kroells
Postal Inspector | U.S. Postal Inspection Service | Twin Cities Field Office
7360 Bush Lake Rd., Ste. 100, Minneapolis, MN 55439
Office: 612-884-7877
<https://postalinspectors.uspis.gov/>

Maria, David (USAMN) 1

From: Maria, David (USAMN) 1
Sent: Tuesday, June 07, 2016 10:23 AM
To: Czapko, Daniel (USAMN)
Subject: RE: Adams Relativity Database

Great – thanks.

From: Czapko, Daniel (USAMN)
Sent: Tuesday, June 07, 2016 10:19 AM
To: Maria, David (USAMN) 1 <dmaria1@usa.doj.gov>
Subject: RE: Adams Relativity Database

David,

A search of these terms came up with 1,000 documents (this is including family, so attachments, etc. were included). I have sent the request to the LTSC for these documents to be placed in a folder that can only be accessed by the LTSC. I will let you know when this has been completed.

Thanks,
Dan

From: Maria, David (USAMN) 1
Sent: Monday, June 06, 2016 10:09 AM
To: Czapko, Daniel (USAMN)
Subject: Adams Relativity Database

Dan,

Can we run a search on the Relativity database for Adams (the one that they created at the LTSC with the Yahoo emails) for the following terms and then have any documents that hit segregated from the database and put into the database that will not be reviewed:

arnstein (and @arnstein.com)
felhaber (and @felhaber.com)
hopeman
amslaw
blandrichter (and @blandrichter.com)
tamburino
caplanlaw (and @caplanlaw.com)
brever

Please let me know if you have any questions.

Thanks,
David

Maria, David (USAMN) 1

From: Maria, David (USAMN) 1
Sent: Monday, October 17, 2016 9:52 AM
To: Czapko, Daniel (USAMN)
Subject: Adams database

Dan—

In reviewing emails on the Edward Adams II database, I'm noticing a few emails that went to an associate at the Adams Monahan law firm – the email address is cmumm@adamsmonahan.com.

When we did the first run of search terms to exclude potentially privileged emails from the database, adamsmonahan.com and adamsmonahan were both search terms. Can we figure out why it didn't capture some of these? We also need to run that one again and pull any hits.

Thanks.

David M. Maria
Assistant United States Attorney
District of Minnesota, Criminal Division
600 U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415
V: 612.664.5681 | F: 612.664.5787

Maria, David (USAMN) 1

From: Maria, David (USAMN) 1
Sent: Tuesday, February 28, 2017 10:54 AM
To: Czapko, Daniel (USAMN)
Subject: Adams Database

Dan,

We need to run one more set of search terms on the "Adams II" email database in Relativity. This should be the final set. These are our search terms to cull this down to relevant documents. Unlike the searches that we ran for potentially privileged documents, the docs that hit on these search terms should remain in the database, and those that don't should be excluded. Once you have run them, let me know, and I will do some spot checking based on certain documents that I have already pulled.

Here are the terms:

Apollo
Diamond
ADI
ADGC
Gemstone
DL
RL
ADR
RBE
ESA
MRM
Scio
SDTC
Krossbow
Linares
Lancia
Zipkin
Nichols
LisaL
LMAInc
Mack
Rapello
Platt
Robb
Larson
McMahon
Bern
McPheely

Let me know if you have any questions.

Thanks,
David

David M. Maria
Assistant United States Attorney
District of Minnesota, Criminal Division
600 U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415
V: 612.664.5681 | F: 612.664.5787

RE: Apollo/Scio emails
From: Beulke, Kurt (MP) (FBI) [Kurt.Beulke@ic.fbi.gov]
To: Kokkinen, John (USAMN); Maria, David (USAMN) 1
Cc: Khan, Jennifer L. (MP) (FBI) [Jennifer.Khan@ic.fbi.gov]
Date: Fri, Mar 18, 2016 4:55 PM ET

Sounds good, guys. I appreciate the information. We'll be in touch.

-----Original Message-----

From: Kokkinen, John (USAMN) [mailto:John.Kokkinen@usdoj.gov]
 Sent: Friday, March 18, 2016 3:39 PM
 To: Maria, David (USAMN) 1 <David.Maria@usdoj.gov>
 Cc: Beulke, Kurt (MP) (FBI) <Kurt.Beulke@ic.fbi.gov>; Khan, Jennifer L. (MP) (FBI) <Jennifer.Khan@ic.fbi.gov>
 Subject: Re: Apollo/Scio emails

Yep, makes sense. We also need to have an AUSA assigned to head up the filter team.

On Mar 18, 2016, at 3:33 PM, Maria, David (USAMN) 1 <dmarial@usa.doj.gov<mailto:dmarial@usa.doj.gov>> wrote:

We still have to figure out a few logistics.

Because of the size of the database, it is going to have to be housed in Relativity at the LTSC instead of loaded into Eclipse here. Unfortunately, that can be a lengthy process. My guess is that there will be nothing available for us to review until the week after next, and possibly the week after that. This sucks, but we don't have an alternative.

Once it is loaded in Relativity, we plan on running a list of search terms to determine the universe of potentially privileged documents. If the search results in a manageable number of documents, that is the universe that you will review. If there are too many hits, we will back up and first do a relevance search and follow that with the same privilege search, which will result in smaller universe.

Short answer is that, once we have a database of documents for you to review, it should not be too many documents. For planning purposes, I'm guessing that you won't have anything to review for at least 2-3 weeks. We'll keep you updated along the way as to timing, but I don't think that you need to set aside too much time.

John - you disagree with any of this?

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 Sent: Friday, March 18, 2016 3:13 PM
 To: Kokkinen, John (USAMN); Maria, David (USAMN) 1
 Cc: Khan, Jennifer L. (MP) (FBI)
 Subject: RE: Apollo/Scio emails

Hey guys,

Any insight you could provide on the potential time commitment and expectations of the taint review prior to its commencement would be appreciated as well. I'm mostly curious for planning/scheduling purposes.

Have a great weekend.

Thanks,
 kurt

 Kurt Beulke | FBI Special Agent | Minneapolis Office
 Phone: 763.569.8362 | Email: kurt.beulke@ic.fbi.gov<mailto:kurt.beulke@ic.fbi.gov>

From: Khan, Jennifer L. (MP) (FBI)
 Sent: Friday, March 18, 2016 2:37 PM
 To: Kokkinen, John (USAMN) <John.kokkinen@usdoj.gov<mailto:John.Kokkinen@usdoj.gov>>; Maria, David (USAMN) 1 <David.Maria@usdoj.gov<mailto:David.Maria@usdoj.gov>>
 Cc: cakroells@uspis.gov<mailto:cakroells@uspis.gov>; Belich, Brandon (USASPC) <Brandon.Belich@usdoj.gov<mailto:Brandon.Belich@usdoj.gov>>; Beulke, Kurt (MP) (FBI) <Kurt.Beulke@ic.fbi.gov<mailto:Kurt.Beulke@ic.fbi.gov>>
 Subject: Apollo/Scio emails

John and David,

SA Kurt Beulke from my squad has kindly agreed to be part of the email review team. Please let him know when you're ready to start the process. I've included him on this email. Thanks!

SA Jennifer L Khan
 Minneapolis FBI-St Paul RA
 C-2 Squad
 651-228-4249-desk

RE: ADAMS - Search Terms for Privilege Filter.docx

From: Kokkinen, John (USAMN)

To: Maria, David (USAMN) 1

Date: Thu, Apr 14, 2016 3:41 PM ET

Looks good.

From: Maria, David (USAMN) 1

Sent: Thursday, April 14, 2016 8:45 AM

To: Kokkinen, John (USAMN)

Subject: ADAMS - Search Terms for Privilege Filter.docx

Here is my initial cut at a list of search terms that could be used to filter the potentially privileged documents in the email database. Once you've reviewed, let me know, and we can shoot to Tim for his input.

<< File: ADAMS - Search Terms for Privilege Filter.docx >>

RE: Adams Privilege/Taint Review

From: Maria, David (USAMN) 1

To: Kokkinen, John (USAMN); Rank, Timothy (USAMN)

Date: Tue, Apr 26, 2016 3:30 PM ET

No.

From: Kokkinen, John (USAMN)

Sent: Tuesday, April 26, 2016 2:30 PM

To: Maria, David (USAMN) 1; Rank, Timothy (USAMN)

Subject: RE: Adams Privilege/Taint Review

Have we come up with a list of relevance search terms yet?

From: Maria, David (USAMN) 1

Sent: Tuesday, April 26, 2016 2:15 PM

To: Rank, Timothy (USAMN); Kokkinen, John (USAMN)

Subject: Adams Privilege/Taint Review

Dan ran the search terms, and the ?general? search terms (?privilege!, ?attorney, ? etc.) were hitting on 70-80% of the documents, due in large part to standard disclaimers that appeared on many/most of the emails.

The more specific terms also had a substantial amount of hits. The specific terms used and the number of each are set forth below:


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klgates	34
kopecky	306
ksblegal	328
latham	3,968
lw.com	3,134
merchantgould	94
sankovitz	1,299
schwegman	1,531
sikora	736
slwip	1,394
watkins	3,604
wc.com	96
zouvas	1,006
Total	32,110

Because our specific search term list was comprehensive, I believe that we are okay just sticking with these terms and dispensing with the general terms. My suggestion would be to segregate/eliminate from our review all of the documents that hit on all of the specific search terms except for ?adamsmonahan, ? adamsgrumbles, ?amlip, ? and ?zouvas, ? as they were all firms that performed legal work for Apollo/Scio, or are firms that have assisted in defending Adams and Monahan in connection with the SEC action (and our investigation). We would then have the taint team review these approx. 12,000 documents for privilege, releasing to us those that are determined not to be privileged. If we think that 12,00 docs are too many for the taint team to review, we can come up with ?relevance search terms? to cull this down to a more manageable number.

Thoughts on this? If everyone is good with this approach, we should be able to open up for review the database with the documents that did not hit on these search terms.

Obviously, this will be an ongoing process to identify potentially relevant documents, and, if we see additional firms or lawyers show up in the emails, we can run searches to segregate these documents.

FW: Follow-Up

From: Maria, David (USAMN) 1
To: Kokkinen, John (USAMN); Rank, Timothy (USAMN)
Date: Tue, Jun 28, 2016 12:12 PM ET
Attachments:  image001.png (3.6 KB)

FYI.

From: David Young [mailto:dyoung@bestlaw.com]
Sent: Tuesday, June 28, 2016 11:09 AM
To: Maria, David (USAMN) 1 <dmaria1@usa.doj.gov>
Subject: RE: Follow-Up

David,

Per your request, I have spoken to Gerald McGuire, Scio's Chief Executive Officer. Following that discussion and with informed consent, Mr. McGuire has directed me to communicate to you that, in Scio's continuing effort to cooperate with the ongoing governmental investigations, Scio will not assert any attorney-client privilege or seek compliance with any duty of confidentiality with regard to work or services performed by Ed Adams, Michael Monahan, the Adams Monahan law firm or the attorneys associated with the Adams Monahan law firm in connection with (1) the Apollo Diamond entities (e.g., Apollo Diamond, Inc. and Apollo Diamond Gemstone Corporation) and (2) the transactions by which the assets of the Apollo Diamonds entities were transitioned to or acquired by either of the Scio Diamond Technology Corporation entities (the original or the current). The waiver of any attorney-client privilege does not include any work performed in connection with patent matters or matters relating to Scio's ongoing business. See *Diversified Indus., Inc. v Meredith*, 572 F.2d 596 (8th Circuit 1977).

David Young
 Attorney
 DIRECT 612.843.5807

 cc

BEST & FLANAGAN LLP
 60 South Sixth Street, Suite 2700 Minneapolis, Minnesota 55402
 TEL 612.339.7121 FAX 612.339.5897 BESTLAW.COM

CONFIDENTIAL: This email may contain confidential and privileged information and is for the intended recipient only. If you are not the intended recipient, please refrain from reading and delete all copies of this email. IRS NOTICE: Any tax advice contained in this email and any attachment was not intended or written to be used, and cannot be used, for the purpose of (1) avoiding penalties that may be imposed under the tax laws, or (2) promoting or recommending any transaction.

From: Maria, David (USAMN) 1 [mailto:David.Maria@usdoj.gov]
Sent: Tuesday, June 28, 2016 9:18 AM
To: David Young
Subject: Follow-Up

David—

Just following up on our call from yesterday regarding privilege/confidentiality issues. Also, Anders Folk may be calling you this morning – he represents JR Maddox, with whom we are scheduled to meet at 11:30 today.

Thanks.

David M. Maria
 Assistant United States Attorney
 District of Minnesota, Criminal Division
 600 U.S. Courthouse
 300 South Fourth Street
 Minneapolis, MN 55415
 V: 612.664.5681 | F: 612.664.5787

Re: Edward Adams case

From: Zeitz, Mark (USAMN)

To: Maria, David (USAMN) 1

Cc: Khan, Jennifer L. (MP) (FBI) [Jennifer.Khan@ic.fbi.gov]; Serres, Hannah (USAMN); Kokkinen, John (USAMN)

Date: Fri, Jul 8, 2016 2:06 PM ET

I checked with the Itsc and she has access to the Edward Adams II workspace.

Sent from my iPhone

On Jul 8, 2016, at 12:57 PM, Maria, David (USAMN) 1 <dmaria1@usa.doj.gov> wrote:

I believe that she has lost all access to the "Edward Adams II" database.

From: Khan, Jennifer L. (MP) (FBI) [mailto:Jennifer.Khan@ic.fbi.gov]

Sent: Friday, July 08, 2016 12:56 PM

To: Zeitz, Mark (USAMN) <mzeit@usa.doj.gov>; Serres, Hannah (USAMN) <hserres@usa.doj.gov>

Cc: Maria, David (USAMN) 1 <dmaria1@usa.doj.gov>; Kokkinen, John (USAMN) <jkokkinen@usa.doj.gov>

Subject: Re: Edward Adams case

I think that those are the emails that I am looking for. From what I understand that review has been completed. I had access to them for awhile and then they disappeared from Relativity. Christie Kroells told me that she had access to review those emails last week.

SA Jennifer L Khan

Minneapolis FBI-St Paul RA

C-2 Squad

651-228-4249-desk

From: Zeitz, Mark (USAMN) <Mark.Zeitz@usdoj.gov>

Sent: Friday, July 8, 2016 12:30 PM

To: Serres, Hannah (USAMN)

Cc: Khan, Jennifer L. (MP) (FBI); Maria, David (USAMN) 1; Kokkinen, John (USAMN)

Subject: RE: Edward Adams case

Hey Jennifer, let me know what emails you are missing. I did see that some emails were put in a secure folder for taint review. Let me know.

Mark

From: Serres, Hannah (USAMN)

Sent: Friday, July 08, 2016 9:37 AM

To: Zeitz, Mark (USAMN)

Cc: Khan, Jennifer L. (MP) (FBI)

Subject: RE: Edward Adams case

Mark -

Jen is looking for emails that were in relatvity and now they are not. Do you think that you can help her or help me help her!

Thanks

Hannah

From: Khan, Jennifer L. (MP) (FBI) [mailto:Jennifer.Khan@ic.fbi.gov]

Sent: Friday, July 08, 2016 8:41 AM

To: Serres, Hannah (USAMN) <hserres@usa.doj.gov>

Subject: Edward Adams case

Hannah,

The emails that we received for this case through a search warrant used to show up under Relativity, which I am able to access from my computer at the FBI. They are no longer showing up. Do you know what happened to them? Did they get moved to a different project? Please let me know when you have a chance. Thanks!

SA Jennifer L Khan

Minneapolis FBI-St Paul RA

C-2 Squad

651-228-4249-desk

RE: Edward Adams case
From: Zeitz, Mark (USAMN)
To: Khan, Jennifer L. (MP) (FBI) [Jennifer.Khan@ic.fbi.gov]; Maria, David (USAMN) 1
Cc: Serres, Hannah (USAMN); Kokkinen, John (USAMN)
Date: Fri, Jul 8, 2016 2:34 PM ET

when you first login you should see a list of workspaces that you have access to that has both projects. If you are already logged in you can click on the downarrow next to your name in the top right corner and click on "Home" to get to the project list.

-----Original Message-----

From: Khan, Jennifer L. (MP) (FBI) [mailto:Jennifer.Khan@ic.fbi.gov]
Sent: Friday, July 08, 2016 1:23 PM
To: Zeitz, Mark (USAMN); Maria, David (USAMN) 1
Cc: Serres, Hannah (USAMN); Kokkinen, John (USAMN)
Subject: Re: Edward Adams case

Only the Edward Adams folder is showing up. I don't see Edward Adams II anywhere.

SA Jennifer L Khan
 Minneapolis FBI-St Paul RA
 C-2 Squad
 651-228-4249-desk

From: Zeitz, Mark (USAMN) <Mark.Zeitz@usdoj.gov>
Sent: Friday, July 8, 2016 1:06 PM
To: Maria, David (USAMN) 1
Cc: Khan, Jennifer L. (MP) (FBI); Serres, Hannah (USAMN); Kokkinen, John (USAMN)
Subject: Re: Edward Adams case

I checked with the Itsc and she has access to the Edward Adams II workspace.

Sent from my iPhone

On Jul 8, 2016, at 12:57 PM, Maria, David (USAMN) 1 <dmarial@usa.doj.gov<mailto:dmarial@usa.doj.gov>> wrote:

I believe that she has lost all access to the "Edward Adams II" database.

From: Khan, Jennifer L. (MP) (FBI) [mailto:Jennifer.Khan@ic.fbi.gov]
Sent: Friday, July 08, 2016 12:56 PM
To: Zeitz, Mark (USAMN) <mzeit@usa.doj.gov<mailto:mzeit@usa.doj.gov>>; Serres, Hannah (USAMN) <hserres@usa.doj.gov<mailto:hserres@usa.doj.gov>>
Cc: Maria, David (USAMN) 1 <dmarial@usa.doj.gov<mailto:dmarial@usa.doj.gov>>; Kokkinen, John (USAMN) <jkokkinen@usa.doj.gov<mailto:jkokkinen@usa.doj.gov>>
Subject: Re: Edward Adams case

I think that those are the emails that I am looking for. From what I understand that review has been completed. I had access to them for awhile and then they disappeared from Relativity. Christie Kroells told me that she had access to review those emails last week.

SA Jennifer L Khan
 Minneapolis FBI-St Paul RA
 C-2 Squad
 651-228-4249-desk

From: Zeitz, Mark (USAMN) <Mark.Zeitz@usdoj.gov<mailto:Mark.Zeitz@usdoj.gov>>
Sent: Friday, July 8, 2016 12:30 PM
To: Serres, Hannah (USAMN)
Cc: Khan, Jennifer L. (MP) (FBI); Maria, David (USAMN) 1; Kokkinen, John (USAMN)
Subject: RE: Edward Adams case

Hey Jennifer, let me know what emails you are missing. I did see that some emails were put in a secure folder for taint review. Let me know.

Mark

From: Serres, Hannah (USAMN)
Sent: Friday, July 08, 2016 9:37 AM
To: Zeitz, Mark (USAMN)
Cc: Khan, Jennifer L. (MP) (FBI)
Subject: RE: Edward Adams case

Mark -

Jen is looking for emails that were in relatvitiy and now they are not. Do you think that you can help her or help me help her!

Thanks
 Hannah

From: Khan, Jennifer L. (MP) (FBI) [mailto:Jennifer.Khan@ic.fbi.gov]
Sent: Friday, July 08, 2016 8:41 AM

To: Serres, Hannah (USAMN) <hserres@usa.doj.gov>
Subject: Edward Adams case

Hannah,

The emails that we received for this case through a search warrant used to show up under Relativity, which I am able to access from my computer at the FBI. They are no longer showing up. Do you know what happened to them? Did they get moved to a different project? Please let me know when you have a chance. Thanks!

SA Jennifer L Khan
Minneapolis FBI-St Paul RA
C-2 Squad
651-228-4249-desk

Czapko, Daniel (USAMN)

From: USALTSC-Coordiators
Sent: Friday, March 18, 2016 11:33 AM
To: Czapko, Daniel (USAMN)
Subject: Edward Adams: LTSC Spec Sheet Received – NO ACTION REQUIRED

LTSC

EOUSA Litigation Technology Service Center

1600 Hampton Street, Room 207 - Columbia, SC 29208

Edward Adams: LTSC Spec Sheet Received

Thank you for your submission. We have received your Spec Sheet, and once we have analyzed your request we will send you an LWP as confirmation. A coordinator will reach out to you if we have any questions.

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(803) 705-5432

Czapko, Daniel (USAMN)

From: Allen, Allison (USALTSC) [Contractor]
Sent: Friday, March 18, 2016 11:42 AM
To: Czapko, Daniel (USAMN)
Cc: Dillon, Robin (USALTSC) [Contractor]
Subject: Edward Adams W9751

Hi Dan,

I opened work order W9751 for this data. Please go ahead and ship the data to my attention at the address in my signature block.

Best,

Allison

Allison Allen

Litigation Technology Service Center (LTSC)
Department of Justice/EOUSA
1600 Hampton Street, Suite 207
Columbia, SC 29208-9997
Office: 803-705-5436
<http://ocio.usa.doi.gov/ltsc/default.aspx>

Czapko, Daniel (USAMN)

From: Czapko, Daniel (USAMN)
Sent: Monday, March 21, 2016 8:06 AM
To: USALTSC-Coordinators
Cc: Dillon, Robin (USALTSC) [Contractor]
Subject: Edward Adams II - New Relativity Project

The material (Edward Adams_II_2016_03_18.zipx) for this project has been uploaded to this share:

\\usa\cloud\LTSC\District\MN\Edward_Adams

Please note that this is spin-off and should be a new, separate project from the original – **Edward Adams II**.
Let me know if there are any questions.

Thanks,
Dan Czapko

Daniel Czapko | Litigation Support Specialist
U.S Attorney's Office | District of Minnesota
600 U.S Courthouse | 300 South Fourth Street | Minneapolis, MN 55415
612-664-5790 | daniel.czapko@usdoj.gov

Czapko, Daniel (USAMN)

From: Dillon, Robin (USALTSC) [Contractor]
Sent: Monday, March 21, 2016 8:06 AM
To: Czapko, Daniel (USAMN)
Subject: Automatic reply: Edward Adams II - New Relativity Project

I am currently out of the office. Please direct your requests to the LTSC Coordinators group (usaltsc-coordinators@usa.doj.gov).

Thanks!

Czapko, Daniel (USAMN)

From: Zeitz, Mark (USAMN)
Sent: Friday, March 25, 2016 8:45 AM
To: Czapko, Daniel (USAMN)
Subject: FW: Edward Adams : C1948W9751(Ref#:EDQARD ADAMS II) : LWP Approval Request – ACTION REQUIRED

Importance: High

From: USALTSC-Coordiators
Sent: Thursday, March 24, 2016 6:44 PM
To: Zeitz, Mark (USAMN); USALTSC-Coordiators
Subject: Edward Adams : C1948W9751(Ref#:EDQARD ADAMS II) : LWP Approval Request – ACTION REQUIRED
Importance: High

LTSC
EOUSA Litigation Technology Service Center
1600 Hampton Street, Room 207 - Columbia, SC 29208

LTSC Litigation Work Plan Approval Request

Work Order: C1948W9751(Ref#:EDQARD ADAMS II)
Case Name: Edward Adams
Work Due On: 4/14/2016

To: Dan Czapko

Thank you for submitting a Preliminary Work Order (PWO) to EOUSA's Litigation Technology Service Center (LTSC). After reviewing your PWO, we request your approval of the following proposed Litigation Work Plan (LWP).

Please read the following Summary of Work and Important Notices below **carefully**. The Summary of Work describes exactly how your Work Order will be fulfilled. Make sure that the Summary of Work is **accurate** and **complete**. Please also make sure you have read and understand the Important Notices below.

If you approve this LWP as it is written, please reply to this email and type "Approve" in the response.

If there is any change needed to this LWP as it is written, please reply to this email with updates needed in the response.

For LTSC Container #44020:
Standard EDD processing will be applied including conversion to TIFF with extracted metadata and text.

Utilize the NIST database to remove system files from processing.

De-duplication will be at the CUSTODIAN level while maintaining the compound files. This will ensure that families will be maintained during processing.

Excels will include extracted text.

.EXE and Non-NIST application files will be excluded from processing.

Image placeholders will be applied for certain document types (hybrid/mixed) – Excel, XML, MS Access, Publisher, Microsoft Project, AutoCad, Quickbooks, unknown files, all Audio/Video files (i.e. WAV, MP3). The Relativity “placeholder” field will be populated with a “Y” for these documents types.

The LTSC will limit images to the first 1,000 pages of each document. If you would like all of the pages of the document imaged, please let us know promptly.

Processing will be in Black & White.

Processing time zone will be set to Central Standard Time.

CUSTODIAN field will be populated per folder in the zip file delivered:

Edward S Adams

Jafman1

Michael Monahan

Unendorsed control number will begin with 00000001.

Configure a new Relativity workspace named Edward Adams_II.

Documents will be foldered Edward Adams_II.

Data will be processed with Relativity Structured Analytics.

A Content Analyst index will be created.

Summary of Work

For work order "C1948W9751(Ref#:EDQARD ADAMS II)," we will be processing 1 container of the following type: "Electronic Folder." We will be applying a label to each container received.

1 Electronic Folder will be processed with "Process Natives" and the following tasks will be performed:

- Inventory
- Staging
- Project Setup
- Peer QC of Project Setup
- Processing: Unpack Natives
- Processing: Extract Text, Images and/or Natives

- Peer QC of Processing
- Export
- Create Hosting Job
- Coordinator QC/Sign-off

+++++

IMPORTANT NOTICES: READ BEFORE APPROVING

• **SECURE SHIPPING PROCEDURES:** Before you ship materials to the LTSC, please note that the LTSC requires strict compliance with the [Secure Shipping USAP, No. 3-13.200.005](#), and noncompliance may result in loss or damage to sensitive materials and require the filing of a formal Security Incident Report with your District Office Security Manager (DOSM) and others in accordance with the [LTSC USAP, No. 3-16.000.002 \(Part 6.B, "Project Security"\)](#). The Secure Shipping USAP mandates the use of either the new FedEx Secure Shipping Admin web portal or Registered Mail on all shipments of information protected from disclosure by law. Furthermore, such shipments must be packaged in accordance with the Secure Shipping USAP's dual-container requirements – using the special secure shipping tape/labels identified in USAP Attachment 1 as appropriate – and you must provide the LTSC with your shipment's tracking number(s) prior to shipping your materials. Also note that Electronically Stored Information (ESI) must be copied and encrypted per the LTSC USAP before shipment (do not send original ESI). Please contact your LTSC Project Coordinator for more information, and carefully review the [LTSC Shipping Requirements](#) for tips regarding how to securely ship your materials.

• **HARD COPY REASSEMBLY:** For projects involving the scanning of hard copy documents, the LTSC provides "physical unitization" services by inserting prep sheets : (1) where there are physical breaks among materials (e.g., staples, clips, rubber bands, etc); or (2) pursuant to clearly specified box/folder instructions from the District. Upon completion, documents will be returned to the folder/binder/etc from which they were removed, but staples, clips, rubber bands, etc. will not be reapplied. Rather, color-coded prep sheets will be included within the returned documents, and the prep sheets will contain markings evidencing the type of fastener that the LTSC removed.

• **LTSC RETENTION PRACTICES MANDATE PROMPT NOTIFICATIONS OF CHANGE REQUESTS:** The LTSC retains only temporarily the documents and electronic data that Districts provide to the LTSC, as well as the electronic data that the LTSC generates in connection with processing those materials. As a result, if you require modifications to an LTSC deliverable, you must make the modification request as soon as possible, and in no event later than 60 days of the fulfillment of your request. If you send the LTSC hard copy documents, the LTSC will return those documents to you. If you provide the LTSC electronic data on physical storage media (e.g., hard drives, CDs, etc.), the LTSC will return that physical storage media (with the data) to you. If you provide electronic data to the LTSC by copying the data to the LTSC's District file share, the data copied to the share will not be returned to you. Rather, data copied to the District file share will be deleted quickly—typically immediately after the data has been staged. In addition, all data the LTSC generates when processing hard copy documents or electronic data, *except data a District has requested be loaded into a hosting platform (i.e., Relativity or iCONNECT)*, will be removed from LTSC servers within 60 days of the fulfillment of your service request. Therefore, if you require modifications to an LTSC deliverable, it is imperative that you notify the LTSC as soon as possible, and in no event later than 60 days of the fulfillment of your request. If you do not make modification requests within 60 days, a modification request will not receive priority over the LTSC's current workload, and you will have to submit a new Preliminary Work Order, send the

documents or electronic data to the LTSC again, and allow for the time needed for the LTSC to re-do all its prior processing work.

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(803) 705-5432

Czapko, Daniel (USAMN)

From: Dillon, Robin (USALTSC) [Contractor]
Sent: Tuesday, April 12, 2016 8:09 AM
To: Czapko, Daniel (USAMN)
Cc: Zeitz, Mark (USAMN)
Subject: RE: Edward Adams : C1948W9751(Ref#:EDWARD ADAMS II) : Work Order Completed

Thanks Dan. I've provided those users with permissions to the workspace. Let me know if you need anything else.

Robin Dillon

Litigation Technology Specialist
Deloitte (Contractor)
Litigation Technology Service Center (LTSC)
Department of Justice/EOUSA
1600 Hampton Street, Suite 207
Columbia, SC 29208-9997
Office: 803-705-5389

From: Czapko, Daniel (USAMN)
Sent: Tuesday, April 12, 2016 9:06 AM
To: Dillon, Robin (USALTSC) [Contractor]
Cc: Zeitz, Mark (USAMN)
Subject: RE: Edward Adams : C1948W9751(Ref#:EDWARD ADAMS II) : Work Order Completed

Robin,

David Maria, John Kokkinen, and Sara O'Reilly should also have access. I think there will also be some agents working on this. I'll find out and get you their info as well.

Thanks,
Dan

From: Dillon, Robin (USALTSC) [Contractor]
Sent: Tuesday, April 12, 2016 7:35 AM
To: Czapko, Daniel (USAMN)
Cc: Zeitz, Mark (USAMN)
Subject: FW: Edward Adams : C1948W9751(Ref#:EDWARD ADAMS II) : Work Order Completed

Sorry Dan. Incorrect email address was used in the spec sheet so this didn't get delivered. I've updated our system with the correct email address.

Thanks!

Robin Dillon

Litigation Technology Specialist
Deloitte (Contractor)
Litigation Technology Service Center (LTSC)
Department of Justice/EOUSA
1600 Hampton Street, Suite 207

Columbia, SC 29208-9997
Office: 803-705-5389

From: Dillon, Robin (USALTSC) [Contractor]
Sent: Tuesday, April 12, 2016 7:50 AM
To: Dan.Czapko@usdoj.gov
Cc: Zeitz, Mark (USAMN)
Subject: RE: Edward Adams : C1948W9751(Ref#:EDWARD ADAMS II) : Work Order Completed

Good morning Dan.

I wasn't sure who should have access to the new Edward Adams_II workspace. I provided you and Mark with permissions but if you get me the names of anyone else needing access I can add them.

Thanks!

Robin Dillon
Litigation Technology Specialist
Deloitte (Contractor)
Litigation Technology Service Center (LTSC)
Department of Justice/EOUSA
1600 Hampton Street, Suite 207
Columbia, SC 29208-9997
Office: 803-705-5389

From: USALTSC-Coordinators
Sent: Tuesday, April 12, 2016 7:49 AM
To: Dan.Czapko@usdoj.gov; USALTSC-Coordinators
Cc: Zeitz, Mark (USAMN)
Subject: Edward Adams : C1948W9751(Ref#:EDWARD ADAMS II) : Work Order Completed

LTSC
EOUSA Litigation Technology Service Center
1600 Hampton Street, Room 207 - Columbia, SC 29208

Work Order Completed

Dear Dan:

Your service request for LTSC processing, work order #C1948W9751(Ref#:EDWARD ADAMS II), has been fulfilled.

Please see the note below from Marc Fulkert, who invites your feedback on the work recently completed by LTSC ([click here](#) to complete the online feedback form and also feel free to contact me directly):

As the Litigation Technology Service Center COR, I would greatly appreciate any / all feedback so that we may continually improve our effort to meet the eDiscovery and document imaging needs of all USAOs going forward.

LTSC RETENTION PRACTICES MANDATE PROMPT NOTIFICATIONS OF CHANGE

REQUESTS: The LTSC retains only temporarily the documents and electronic data that Districts provide to the LTSC, as well as the electronic data that the LTSC generates in connection with processing those materials. As a result, if you require modifications to an LTSC deliverable, you must make the modification request as soon as possible, and in no event later than 60 days of the fulfillment of your request. If you send the LTSC hard copy documents, the LTSC will return those documents to you. If you provide the LTSC electronic data on physical storage media (e.g., hard drives, CDs, etc.), the LTSC will return that physical storage media (with the data) to you. If you provide electronic data to the LTSC by copying the data to the LTSC's District file share, the data copied to the share will not be returned to you. Rather, data copied to the District file share will be deleted quickly—typically immediately after the data has been staged. In addition, all data the LTSC generates when processing hard copy documents or electronic data, *except data a District has requested be loaded into a hosting platform (i.e., Relativity or iCONNECT)*, will be removed from LTSC servers within 60 days of the fulfillment of your service request. Therefore, if you require modifications to an LTSC deliverable, it is imperative that you notify the LTSC as soon as possible, and in no event later than 60 days of the fulfillment of your request. If you do not make modification requests within 60 days, a modification request will not receive priority over the LTSC's current workload, and you will have to submit a new Preliminary Work Order, send the documents or electronic data to the LTSC again, and allow for the time needed for the LTSC to re-do all its prior processing work.

-Marc

Marc Fulkert, LTSC Managing Attorney
 Litigation Technology Service Center COR
 Office of the Chief Information Officer
 Executive Office for United States Attorneys
 Desk: (803) 705-5422

Czapko, Daniel (USAMN)

From: Czapko, Daniel (USAMN)
Sent: Monday, April 25, 2016 4:30 PM
To: Maria, David (USAMN) 1
Subject: Adams Search terms
Attachments: Spedific Search Terms.xlsx

David,

These are the breakdowns of number of documents. The earlier number of 20,000 was lower due to overlap (more than one hit in a document).

Thanks,
Dan

Czapko, Daniel (USAMN)

From: Czapko, Daniel (USAMN)
Sent: Wednesday, April 27, 2016 12:55 PM
To: Maria, David (USAMN) 1; McConville, Daniel (USAMN)
Subject: RE: Relativity database

David,

I will get them added.

Dan C.

From: Maria, David (USAMN) 1
Sent: Wednesday, April 27, 2016 12:47 PM
To: McConville, Daniel (USAMN)
Cc: Czapko, Daniel (USAMN)
Subject: Relativity database

Dan and Dan—

For the Edward Adams/Monahan (aka Scio Diamond, aka Apollo Diamond) project, the following agents will need access to the database in Relativity:

Brandon Belich (IRS)
Jennifer Khan (FBI)
Kristy Kroells (Postal)

Thanks,
David

Czapko, Daniel (USAMN)

From: USALTSC-Coordiators
Sent: Wednesday, April 27, 2016 2:38 PM
To: Czapko, Daniel (USAMN)
Subject: Edward Adams: LTSC Spec Sheet Received – NO ACTION REQUIRED

LTSC

EOUSA Litigation Technology Service Center

1600 Hampton Street, Room 207 - Columbia, SC 29208

Edward Adams: LTSC Spec Sheet Received

Thank you for your submission. We have received your Spec Sheet, and once we have analyzed your request we will send you an LWP as confirmation. A coordinator will reach out to you if we have any questions.

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(803) 705-5432

Czapko, Daniel (USAMN)

From: Czapko, Daniel (USAMN)
Sent: Wednesday, April 27, 2016 4:11 PM
To: USALTSC-Coordinators
Cc: Zeitz, Mark (USAMN)
Subject: RE: Edward Adams : C1948W10173 : LWP Approval Request – ACTION REQUIRED

Approve This is for the Edward Adams II workspace.

Thanks,
Dan

Daniel Czapko | Litigation Support Specialist

U.S Attorney's Office | District of Minnesota
600 U.S Courthouse | 300 South Fourth Street | Minneapolis, MN 55415
612-664-5790 | daniel.czapko@usdoj.gov

From: USALTSC-Coordinators
Sent: Wednesday, April 27, 2016 3:51 PM
To: Czapko, Daniel (USAMN); USALTSC-Coordinators
Cc: Zeitz, Mark (USAMN)
Subject: Edward Adams : C1948W10173 : LWP Approval Request – ACTION REQUIRED
Importance: High

LTSC

EOUSA Litigation Technology Service Center

1600 Hampton Street, Room 207 - Columbia, SC 29208

LTSC Litigation Work Plan Approval Request

Work Order: C1948W10173
Case Name: Edward Adams
Work Due On: 5/2/2016

To: Dan Czapko

Thank you for submitting a Preliminary Work Order (PWO) to EOUSA's Litigation Technology Service Center (LTSC). After reviewing your PWO, we request your approval of the following proposed Litigation Work Plan (LWP).

Please read the following Summary of Work and Important Notices below **carefully**. The Summary of Work describes exactly how your Work Order will be fulfilled. Make sure that the Summary of Work is **accurate** and **complete**. Please also make sure you have read and understand the Important Notices below.

If you approve this LWP as it is written, please reply to this email and type "Approve" in the response.

If there is any change needed to this LWP as it is written, please reply to this email with updates needed in the response.

For LTSC Container #44805:

The LTSC will create a new secured folder named "Taint Review". This folder should be accessible to the district admins.

Results of the following saved searches will be moved into the "Taint Review" folder:

Pot Priv - adamsgrumbles

Pot Priv - adamsmonahan

Pot Priv - amllp

Pot Priv - zouvas

For LTSC Container #44806:

The LTSC will create a new secured folder named "Not For Review". This folder should be accessible only to the LTSC.

Results of the following saved searches will be moved into the "Not For Review" folder:

Pot Priv - anthonyostlund

Pot Priv - dorsey

Pot Priv - fredlaw

Pot Priv - fredrikson

Pot Priv - K&L

Pot Priv - klgates

Pot Priv - kopecky

Pot Priv - ksblegal

Pot Priv - latham

Pot Priv - lw.com

Pot Priv - merchantgould

Pot Priv - sankovitz

Pot Priv - schwegman

Pot Priv - sikora

Pot Priv - slwip

Pot Priv - watkins

Pot Priv - wc.com

Summary of Work

For work order "C1948W10173," we will be processing 2 containers of the following type: "Electronic Folder." We will be applying a label to each container received.

2 Electronic Folders will be processed with "Relativity Folder Updates" and the following tasks will be performed:

- Coordinator Review and Assign
- Create New Secured Folder

- Move Documents
- Tech QC of Deliverable
- Coordinator QC/Sign-off

The following hosting jobs will be completed:

- **W10173-19306:** 0.00 GB consisting of 11381 docs, 0 pages, and 0 native files loaded to Relativity
- **W10173-19305:** 0.00 GB consisting of 10457 docs, 0 pages, and 0 native files loaded to Relativity

+++++

IMPORTANT NOTICES: READ BEFORE APPROVING

• **SECURE SHIPPING PROCEDURES:** Before you ship materials to the LTSC, please note that the LTSC requires strict compliance with the [Secure Shipping USAP, No. 3-13.200.005](#), and noncompliance may result in loss or damage to sensitive materials and require the filing of a formal Security Incident Report with your District Office Security Manager (DOSM) and others in accordance with the [LTSC USAP, No. 3-16.000.002 \(Part 6.B, "Project Security"\)](#). The Secure Shipping USAP mandates the use of either the new FedEx Secure Shipping Admin web portal or Registered Mail on all shipments of information protected from disclosure by law. Furthermore, such shipments must be packaged in accordance with the Secure Shipping USAP's dual-container requirements – using the special secure shipping tape/labels identified in USAP Attachment 1 as appropriate – and you must provide the LTSC with your shipment's tracking number(s) prior to shipping your materials. Also note that Electronically Stored Information (ESI) must be copied and encrypted per the LTSC USAP before shipment (do not send original ESI). Please contact your LTSC Project Coordinator for more information, and carefully review the [LTSC Shipping Requirements](#) for tips regarding how to securely ship your materials.

• **HARD COPY REASSEMBLY:** For projects involving the scanning of hard copy documents, the LTSC provides "physical unitization" services by inserting prep sheets : (1) where there are physical breaks among materials (e.g., staples, clips, rubber bands, etc); or (2) pursuant to clearly specified box/folder instructions from the District. Upon completion, documents will be returned to the folder/binder/etc from which they were removed, but staples, clips, rubber bands, etc. will not be reapplied. Rather, color-coded prep sheets will be included within the returned documents, and the prep sheets will contain markings evidencing the type of fastener that the LTSC removed.

• **LTSC RETENTION PRACTICES MANDATE PROMPT NOTIFICATIONS OF CHANGE REQUESTS:** The LTSC retains only temporarily the documents and electronic data that Districts provide to the LTSC, as well as the electronic data that the LTSC generates in connection with processing those materials. As a result, if you require modifications to an LTSC deliverable, you must make the modification request as soon as possible, and in no event later than 60 days of the fulfillment of your request. If you send the LTSC hard copy documents, the LTSC will return those documents to you. If you provide the LTSC electronic data on physical storage media (e.g., hard drives, CDs, etc.), the LTSC will return that physical storage media (with the data) to you. If you provide electronic data to the LTSC by copying the data to the LTSC's District file share, the data copied to the share will not be returned to you. Rather, data copied to the District file share will be deleted quickly—typically immediately after the data has been staged. In addition, all data the LTSC generates when processing hard copy documents or electronic data, *except data a District has*

requested be loaded into a hosting platform (i.e., Relativity or iCONNECT) , will be removed from LTSC servers within 60 days of the fulfillment of your service request. Therefore, if you require modifications to an LTSC deliverable, it is imperative that you notify the LTSC as soon as possible, and in no event later than 60 days of the fulfillment of your request. If you do not make modification requests within 60 days, a modification request will not receive priority over the LTSC's current workload, and you will have to submit a new Preliminary Work Order, send the documents or electronic data to the LTSC again, and allow for the time needed for the LTSC to re-do all its prior processing work.

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(803) 705-5432

Czapko, Daniel (USAMN)

From: Czapko, Daniel (USAMN)
Sent: Thursday, April 28, 2016 8:00 AM
To: Dillon, Robin (USALTSC) [Contractor]
Cc: Zeitz, Mark (USAMN)
Subject: RE: Edward Adams : C1948W10173 : LWP Approval Request – ACTION REQUIRED

No worries, that's what I thought. Just wanted to make sure.

Dan

From: Dillon, Robin (USALTSC) [Contractor]
Sent: Wednesday, April 27, 2016 4:14 PM
To: Czapko, Daniel (USAMN)
Cc: Zeitz, Mark (USAMN)
Subject: RE: Edward Adams : C1948W10173 : LWP Approval Request – ACTION REQUIRED

Sorry guys. That is reflected in our system but I forgot to include the language in the LWP. Forgot this case name in our system is associated with both workspaces.

Robin Dillon

Litigation Technology Specialist
Deloitte (Contractor)
Litigation Technology Service Center (LTSC)
Department of Justice/EOUSA
1600 Hampton Street, Suite 207
Columbia, SC 29208-9997
Office: 803-705-5389

From: Czapko, Daniel (USAMN)
Sent: Wednesday, April 27, 2016 5:11 PM
To: USALTSC-Coordinators
Cc: Zeitz, Mark (USAMN)
Subject: RE: Edward Adams : C1948W10173 : LWP Approval Request – ACTION REQUIRED

Approve This is for the Edward Adams II workspace.

Thanks,
Dan

Daniel Czapko | Litigation Support Specialist

U.S Attorney's Office | District of Minnesota
600 U.S Courthouse | 300 South Fourth Street | Minneapolis, MN 55415
612-664-5790 | daniel.czapko@usdoj.gov

From: USALTSC-Coordinators
Sent: Wednesday, April 27, 2016 3:51 PM

To: Czapko, Daniel (USAMN); USALTSC-Coordiators

Cc: Zeitz, Mark (USAMN)

Subject: Edward Adams : C1948W10173 : LWP Approval Request – ACTION REQUIRED

Importance: High

LTSC

EOUSA Litigation Technology Service Center

1600 Hampton Street, Room 207 - Columbia, SC 29208

LTSC Litigation Work Plan Approval Request

Work Order: C1948W10173

Case Name: Edward Adams

Work Due On: 5/2/2016

To: Dan Czapko

Thank you for submitting a Preliminary Work Order (PWO) to EOUSA's Litigation Technology Service Center (LTSC). After reviewing your PWO, we request your approval of the following proposed Litigation Work Plan (LWP).

Please read the following Summary of Work and Important Notices below **carefully**. The Summary of Work describes exactly how your Work Order will be fulfilled. Make sure that the Summary of Work is **accurate** and **complete**. Please also make sure you have read and understand the Important Notices below.

If you approve this LWP as it is written, please reply to this email and type "Approve" in the response.

If there is any change needed to this LWP as it is written, please reply to this email with updates needed in the response.

For LTSC Container #44805:

The LTSC will create a new secured folder named "Taint Review". This folder should be accessible to the district admins.

Results of the following saved searches will be moved into the "Taint Review" folder:

Pot Priv - adamsgrumbles

Pot Priv - adamsmonahan

Pot Priv - amlp

Pot Priv - zouvas

For LTSC Container #44806:

The LTSC will create a new secured folder named "Not For Review". This folder should be accessible only to the LTSC.

Results of the following saved searches will be moved into the "Not For Review" folder:

Pot Priv - anthonyostlund

Pot Priv - dorsey

Pot Priv - fredlaw
 Pot Priv - fredrikson
 Pot Priv - K&L
 Pot Priv - klgates
 Pot Priv - kopecky
 Pot Priv - ksblegal
 Pot Priv - latham
 Pot Priv - lw.com
 Pot Priv - merchantgould
 Pot Priv - sankovitz
 Pot Priv - schwegman
 Pot Priv - sikora
 Pot Priv - slwip
 Pot Priv - watkins
 Pot Priv - wc.com

Summary of Work

For work order "C1948W10173," we will be processing 2 containers of the following type: "Electronic Folder." We will be applying a label to each container received.

2 Electronic Folders will be processed with "Relativity Folder Updates" and the following tasks will be performed:

- Coordinator Review and Assign
- Create New Secured Folder
- Move Documents
- Tech QC of Deliverable
- Coordinator QC/Sign-off

The following hosting jobs will be completed:

- **W10173-19306:** 0.00 GB consisting of 11381 docs, 0 pages, and 0 native files loaded to Relativity
- **W10173-19305:** 0.00 GB consisting of 10457 docs, 0 pages, and 0 native files loaded to Relativity

+++++

IMPORTANT NOTICES: READ BEFORE APPROVING

- **SECURE SHIPPING PROCEDURES:** Before you ship materials to the LTSC, please note that the LTSC requires strict compliance with the [Secure Shipping USAP, No. 3-13.200.005](#), and noncompliance may result in loss or damage to sensitive materials and require the filing of a formal Security Incident Report with your District Office Security Manager (DOSM) and others in accordance with the [LTSC USAP, No. 3-16.000.002 \(Part 6.B, "Project Security"\)](#). The Secure Shipping USAP mandates the use of either the new FedEx Secure Shipping Admin web portal or Registered Mail on all shipments of information protected from disclosure by law. Furthermore, such shipments must be packaged in accordance with the Secure Shipping USAP's dual-container requirements – using the special secure shipping tape/labels identified in USAP Attachment 1 as

appropriate – and you must provide the LTSC with your shipment's tracking number(s) prior to shipping your materials. Also note that Electronically Stored Information (ESI) must be copied and encrypted per the LTSC USAP before shipment (do not send original ESI). Please contact your LTSC Project Coordinator for more information, and carefully review the [LTSC Shipping Requirements](#) for tips regarding how to securely ship your materials.

- **HARD COPY REASSEMBLY:** For projects involving the scanning of hard copy documents, the LTSC provides "physical unitization" services by inserting prep sheets : (1) where there are physical breaks among materials (e.g., staples, clips, rubber bands, etc); or (2) pursuant to clearly specified box/folder instructions from the District. Upon completion, documents will be returned to the folder/binder/etc from which they were removed, but staples, clips, rubber bands, etc. will not be reapplied. Rather, color-coded prep sheets will be included within the returned documents, and the prep sheets will contain markings evidencing the type of fastener that the LTSC removed.

- **LTSC RETENTION PRACTICES MANDATE PROMPT NOTIFICATIONS OF CHANGE REQUESTS:** The LTSC retains only temporarily the documents and electronic data that Districts provide to the LTSC, as well as the electronic data that the LTSC generates in connection with processing those materials. As a result, if you require modifications to an LTSC deliverable, you must make the modification request as soon as possible, and in no event later than 60 days of the fulfillment of your request. If you send the LTSC hard copy documents, the LTSC will return those documents to you. If you provide the LTSC electronic data on physical storage media (e.g., hard drives, CDs, etc.), the LTSC will return that physical storage media (with the data) to you. If you provide electronic data to the LTSC by copying the data to the LTSC's District file share, the data copied to the share will not be returned to you. Rather, data copied to the District file share will be deleted quickly—typically immediately after the data has been staged. In addition, all data the LTSC generates when processing hard copy documents or electronic data, *except data a District has requested be loaded into a hosting platform (i.e., Relativity or iCONNECT)*, will be removed from LTSC servers within 60 days of the fulfillment of your service request. Therefore, if you require modifications to an LTSC deliverable, it is imperative that you notify the LTSC as soon as possible, and in no event later than 60 days of the fulfillment of your request. If you do not make modification requests within 60 days, a modification request will not receive priority over the LTSC's current workload, and you will have to submit a new Preliminary Work Order, send the documents or electronic data to the LTSC again, and allow for the time needed for the LTSC to re-do all its prior processing work.

Czapko, Daniel (USAMN)

From: USALTSC-Coordiators
Sent: Friday, April 29, 2016 1:50 PM
To: Czapko, Daniel (USAMN); USALTSC-Coordiators
Cc: Zeitz, Mark (USAMN)
Subject: Edward Adams : C1948W10173 : Work Has Begun

LTSC

EOUSA Litigation Technology Service Center

1600 Hampton Street, Room 207 - Columbia, SC 29208

Work Has Begun on Work Order "C1948W10173" for Case Name: "Edward Adams"
Work Due On: 5/2/2016

To: Dan Czapko

The LTSC has received all containers as expected. We will be processing 2 containers of type: "Electronic Folder." We will be applying a label to each container received.

Each Electronic Folder will be processed with "Relativity Folder Updates" and the following tasks will be performed:

- Coordinator Review and Assign
- Create New Secured Folder
- Move Documents
- Tech QC of Deliverable
- Coordinator QC/Sign-off

LTSC RETENTION PRACTICES MANDATE PROMPT NOTIFICATIONS OF CHANGE REQUESTS:

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documents or electronic data to the LTSC again, and allow for the time needed for the LTSC to re-do all its prior processing work.

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(803) 705-5432

Czapko, Daniel (USAMN)

From: Czapko, Daniel (USAMN)
Sent: Tuesday, May 3, 2016 8:15 AM
To: Zeitz, Mark (USAMN)
Subject: RE: W10173 Edward Adams - Refoldering questions

I just talked to Robin about this.
Dan

From: Dillon, Robin (USALTSC) [Contractor]
Sent: Monday, May 02, 2016 7:01 AM
To: Czapko, Daniel (USAMN); Zeitz, Mark (USAMN)
Subject: W10173 Edward Adams - Refoldering questions

Hi Dan and Mark.

We need some clarification on the secured re-folding request for Edward Adams:

1 - Looks like neither of the searches include families - if we move forward as-is, groups will be split and family items of the search hits will be unsecured. And of course, depending on whether the family items are parent or child, it's possible that items intended to be secured may still be available natively via the unsecured items. Is this your intent? I combined your "Pot Priv" searches into the two below searches for reference.

W10173_Not For Review - 10,457 hits; 18,368 hits with family
W10173_Taint Review - 11,381 hits; 19,367 hits with family

2 - There are 1,213 items that are returned by both searches (3,070 if you include families). How are these items to be handled given that the destination folder permissions are different?

Thanks,
Robin

Litigation Technology Help Desk (LTHD)
Hours: Mon-Fri 8:00 am-9:00 pm EST
Email: usaltsc-support@usa.doj.gov
Tel: (803) 705-5444
Website: <http://ocio.usa.doj.gov/lthd>

Czapko, Daniel (USAMN)

From: USALTSC-Coordinators
Sent: Tuesday, May 3, 2016 2:53 PM
To: Czapko, Daniel (USAMN); USALTSC-Coordinators
Cc: Zeitz, Mark (USAMN)
Subject: Edward Adams : C1948W10173 : Work Order Completed

LTSC

EOUSA Litigation Technology Service Center

1600 Hampton Street, Room 207 - Columbia, SC 29208

Work Order Completed

Dear Dan:

Your service request for LTSC processing, work order #C1948W10173, has been fulfilled.

Please see the note below from Marc Fulkert, who invites your feedback on the work recently completed by LTSC ([click here](#) to complete the online feedback form and also feel free to contact me directly):

As the Litigation Technology Service Center COR, I would greatly appreciate any / all feedback so that we may continually improve our effort to meet the eDiscovery and document imaging needs of all USAOs going forward.

LTSC RETENTION PRACTICES MANDATE PROMPT NOTIFICATIONS OF CHANGE REQUESTS: The LTSC retains only temporarily the documents and electronic data that Districts provide to the LTSC, as well as the electronic data that the LTSC generates in connection with processing those materials. As a result, if you require modifications to an LTSC deliverable, you must make the modification request as soon as possible, and in no event later than 60 days of the fulfillment of your request. If you send the LTSC hard copy documents, the LTSC will return those documents to you. If you provide the LTSC electronic data on physical storage media (e.g., hard drives, CDs, etc.), the LTSC will return that physical storage media (with the data) to you. If you provide electronic data to the LTSC by copying the data to the LTSC's District file share, the data copied to the share will not be returned to you. Rather, data copied to the District file share will be deleted quickly—typically immediately after the data has been staged. In addition, all data the LTSC generates when processing hard copy documents or electronic data, *except data a District has requested be loaded into a hosting platform (i.e., Relativity or iCONNECT)*, will be removed from LTSC servers within 60 days of the fulfillment of your service request. Therefore, if you require modifications to an LTSC deliverable, it is imperative that you notify the LTSC as soon as possible, and in no event later than 60 days of the fulfillment of your request. If you do not make modification requests within 60 days, a modification request will not receive priority over the LTSC's current workload, and you will have to submit a new Preliminary Work Order, send the documents or electronic data to the LTSC again, and allow for the time needed for the LTSC to re-do all its prior processing work.

-Marc

Marc Fulkert, LTSC Managing Attorney
Litigation Technology Service Center COR
Office of the Chief Information Officer
Executive Office for United States Attorneys
Desk: (803) 705-5422

Czapko, Daniel (USAMN)

From: Czapko, Daniel (USAMN)
Sent: Tuesday, May 3, 2016 4:18 PM
To: Maria, David (USAMN) 1
Subject: RE: Adams II

Yes. You will only have access to that material. There is a Taint Review folder that you won't see that we can give the review team access to. The other material is set aside separately which only the LTSC has access to at this time.

Dan

From: Maria, David (USAMN) 1
Sent: Tuesday, May 03, 2016 3:48 PM
To: Czapko, Daniel (USAMN)
Subject: Re: Adams II

Thanks. Does that mean that all potentially privileged docs have been removed from the main database?

Sent from my iPhone

On May 3, 2016, at 3:41 PM, Czapko, Daniel (USAMN) <dczapko@usa.doj.gov> wrote:

David,

The Adams II Relativity Taint review folder has been set up. Let me know if you have any questions and when you have a list of the review team.

Thanks,
Dan

Czapko, Daniel (USAMN)

From: Johnson, Amanda K. (USALTSC) [Contractor]
Sent: Thursday, May 5, 2016 11:05 AM
To: Czapko, Daniel (USAMN); USALTSC-Coordinators
Subject: RE: Relativity database

Hello Daniel,

Brandon already has access to this workspace, can you confirm with him that he sees it in his list when he logs into Relativity?

We have added this workspace to Jennifer and Christine's existing Relativity accounts and they should see this in their list the next time they log in.

Please let us know if we can assist you further.

Thanks,

Amanda Johnson

Deloitte (Contractor)
Litigation Technology Service Center (LTSC)
Department of Justice/EOUSA
1600 Hampton Street, Suite 207
Columbia, SC 29208-9997
1-803-705-5432

From: Czapko, Daniel (USAMN)
Sent: Thursday, May 05, 2016 11:57 AM
To: USALTSC-Coordinators
Subject: FW: Relativity database

Please give the following agents access to the Edward Adams II workspace in Relativity. They should NOT have access to the Taint Review or Not For Review folders:

Brandon Belich (IRS)
Jennifer Khan (FBI)
Christine Kroells (USPIS)

Let me know if you have any questions or need more information.

Thanks,
Dan

Daniel Czapko | Litigation Support Specialist
U.S Attorney's Office | District of Minnesota
600 U.S Courthouse | 300 South Fourth Street | Minneapolis, MN 55415

612-664-5790 | daniel.czapko@usdoj.gov

Czapko, Daniel (USAMN)

From: Czapko, Daniel (USAMN)
Sent: Thursday, May 5, 2016 11:14 AM
To: brandon.belich@ci.irs.gov
Cc: Maria, David (USAMN) 1
Subject: Edward Adams II Relativity

Brandon,

David Maria asked me to get you access to this workspace in Relativity. The LTSC said that you should already have access. Can you confirm that?

Thanks,
Dan Czapko

Daniel Czapko | Litigation Support Specialist
U.S Attorney's Office | District of Minnesota
600 U.S Courthouse | 300 South Fourth Street | Minneapolis, MN 55415
612-664-5790 | daniel.czapko@usdoj.gov

Czapko, Daniel (USAMN)

From: Maria, David (USAMN) 1
Sent: Thursday, May 5, 2016 11:19 AM
To: Czapko, Daniel (USAMN)
Cc: Khan, Jennifer L. (MP) (FBI); CAKroells@uspis.gov; brandon.belich@ci.irs.gov
Subject: RE: Relativity database

Thanks Dan.

From: Czapko, Daniel (USAMN)
Sent: Thursday, May 05, 2016 11:18 AM
To: Maria, David (USAMN) 1
Cc: Khan, Jennifer L. (MP) (FBI); CAKroells@uspis.gov; brandon.belich@ci.irs.gov
Subject: RE: Relativity database

David,

Jennifer and Christine have been added. They should see it the next time they log into Relativity.
Brandon should already have access. Let me know if he can't see it.

Thanks,
Dan C.

From: Maria, David (USAMN) 1
Sent: Wednesday, April 27, 2016 12:47 PM
To: McConville, Daniel (USAMN)
Cc: Czapko, Daniel (USAMN)
Subject: Relativity database

Dan and Dan—

For the Edward Adams/Monahan (aka Scio Diamond, aka Apollo Diamond) project, the following agents will need access to the database in Relativity:

Brandon Belich (IRS)
Jennifer Khan (FBI)
Kristy Kroells (Postal)

Thanks,
David

Czapko, Daniel (USAMN)

From: Maria, David (USAMN) 1
Sent: Monday, June 6, 2016 10:09 AM
To: Czapko, Daniel (USAMN)
Subject: Adams Relativity Database

Dan,

Can we run a search on the Relativity database for Adams (the one that they created at the LTSC with the Yahoo emails) for the following terms and then have any documents that hit segregated from the database and put into the database that will not be reviewed:

arnstein (and @arnstein.com)
felhaber (and @felhaber.com)
hopeman
amslaw
blandrichter (and @blandrichter.com)
tamburino
caplanlaw (and @caplanlaw.com)
brever

Please let me know if you have any questions.

Thanks,
David

Czapko, Daniel (USAMN)

From: USALTSC-Coordiators
Sent: Tuesday, June 7, 2016 10:13 AM
To: Czapko, Daniel (USAMN)
Subject: Edward Adams: LTSC Spec Sheet Received – NO ACTION REQUIRED

LTSC

EOUSA Litigation Technology Service Center

1600 Hampton Street, Room 207 - Columbia, SC 29208

Edward Adams: LTSC Spec Sheet Received

Thank you for your submission. We have received your Spec Sheet, and once we have analyzed your request we will send you an LWP as confirmation. A coordinator will reach out to you if we have any questions.

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(803) 705-5432

Czapko, Daniel (USAMN)

From: Maria, David (USAMN) 1
Sent: Tuesday, June 7, 2016 10:23 AM
To: Czapko, Daniel (USAMN)
Subject: RE: Adams Relativity Database

Great – thanks.

From: Czapko, Daniel (USAMN)
Sent: Tuesday, June 07, 2016 10:19 AM
To: Maria, David (USAMN) 1 <dmaria1@usa.doj.gov>
Subject: RE: Adams Relativity Database

David,

A search of these terms came up with 1,000 documents (this is including family, so attachments, etc. were included). I have sent the request to the LTSC for these documents to be placed in a folder that can only be accessed by the LTSC. I will let you know when this has been completed.

Thanks,
Dan

From: Maria, David (USAMN) 1
Sent: Monday, June 06, 2016 10:09 AM
To: Czapko, Daniel (USAMN)
Subject: Adams Relativity Database

Dan,

Can we run a search on the Relativity database for Adams (the one that they created at the LTSC with the Yahoo emails) for the following terms and then have any documents that hit segregated from the database and put into the database that will not be reviewed:

arnstein (and @arnstein.com)
felhaber (and @felhaber.com)
hopeman
amslaw
blandrichter (and @blandrichter.com)
tamburino
caplanlaw (and @caplanlaw.com)
brever

Please let me know if you have any questions.

Thanks,
David

Czapko, Daniel (USAMN)

From: Czapko, Daniel (USAMN)
Sent: Wednesday, June 8, 2016 3:32 PM
To: Dillon, Robin (USALTSC) [Contractor]; USALTSC-Coordinators
Cc: Zeitz, Mark (USAMN)
Subject: RE: Edward Adams : C1948W10546(Ref#:01 Potential Privilege - All) : LWP Approval Request – ACTION REQUIRED

Approved!

Thanks,
Dan Czapko

From: Dillon, Robin (USALTSC) [Contractor]
Sent: Wednesday, June 08, 2016 2:37 PM
To: USALTSC-Coordinators; Czapko, Daniel (USAMN)
Cc: Zeitz, Mark (USAMN)
Subject: RE: Edward Adams : C1948W10546(Ref#:01 Potential Privilege - All) : LWP Approval Request – ACTION REQUIRED

Hi Dan.

Please review and approve the below LWP.

Thanks!

Robin Dillon
Litigation Technology Specialist
Deloitte (Contractor)
Litigation Technology Service Center (LTSC)
Department of Justice/EOUSA
1600 Hampton Street, Suite 207
Columbia, SC 29208-9997
Office: 803-705-5389

From: USALTSC-Coordinators
Sent: Tuesday, June 07, 2016 3:47 PM
To: Czapko, Daniel (USAMN); USALTSC-Coordinators
Cc: Zeitz, Mark (USAMN)
Subject: Edward Adams : C1948W10546(Ref#:01 Potential Privilege - All) : LWP Approval Request – ACTION REQUIRED
Importance: High

LTSC

EOUSA Litigation Technology Service Center

1600 Hampton Street, Room 207 - Columbia, SC 29208

LTSC Litigation Work Plan Approval Request

Work Order: C1948W10546(Ref#:01 Potential Privilege - All)
Case Name: Edward Adams
Work Due On: 6/10/2016

To: Dan Czapko

Thank you for submitting a Preliminary Work Order (PWO) to EOUSA's Litigation Technology Service Center (LTSC). After reviewing your PWO, we request your approval of the following proposed Litigation Work Plan (LWP).

Please read the following Summary of Work and Important Notices below **carefully**. The Summary of Work describes exactly how your Work Order will be fulfilled. Make sure that the Summary of Work is **accurate** and **complete**. Please also make sure you have read and understand the Important Notices below.

If you approve this LWP as it is written, please reply to this email and type "Approve" in the response.

If there is any change needed to this LWP as it is written, please reply to this email with updates needed in the response.

For LTSC Container #45437:

In the Edward Adams_II workspace, documents in the results of saved search "01 Potential Privilege - All" will be moved to the secured folder "Not For Review". The folder will only be available to the LTSC.

Summary of Work

For work order "C1948W10546(Ref#:01 Potential Privilege - All)," we will be processing 1 container of the following type: "Electronic Folder." We will be applying a label to each container received.

1 Electronic Folder will be processed with "Relativity Folder Updates" and the following tasks will be performed:

- Coordinator Review and Assign
- Create Hosting Job
- Move Documents
- Tech QC of Deliverable
- Coordinator QC/Sign-off

The following hosting jobs will be completed:

- **W10546-20037:** 0.00 GB consisting of 1494 docs, 0 pages, and 0 native files loaded to Relativity

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IMPORTANT NOTICES: READ BEFORE APPROVING

- **SECURE SHIPPING PROCEDURES:** Before you ship materials to the LTSC, please note that the LTSC requires strict compliance with the [Secure Shipping USAP, No. 3-13.200.005](#), and noncompliance may result in loss or damage to sensitive materials and require the filing of a formal Security Incident Report with your District Office Security Manager (DOSM) and others in accordance with the [LTSC USAP, No. 3-16.000.002 \(Part 6.B, "Project Security"\)](#). The Secure Shipping USAP mandates the use of either the new FedEx Secure Shipping Admin web portal or Registered Mail on all shipments of information protected from disclosure by law. Furthermore, such shipments must be packaged in accordance with the Secure Shipping USAP's dual-container requirements – using the special secure shipping tape/labels identified in USAP Attachment 1 as appropriate – and you must provide the LTSC with your shipment's tracking number(s) prior to shipping your materials. Also note that Electronically Stored Information (ESI) must be copied and encrypted per the LTSC USAP before shipment (do not send original ESI). Please contact your LTSC Project Coordinator for more information, and carefully review the [LTSC Shipping Requirements](#) for tips regarding how to securely ship your materials.

- **HARD COPY REASSEMBLY:** For projects involving the scanning of hard copy documents, the LTSC provides "physical unitization" services by inserting prep sheets : (1) where there are physical breaks among materials (e.g., staples, clips, rubber bands, etc); or (2) pursuant to clearly specified box/folder instructions from the District. Upon completion, documents will be returned to the folder/binder/etc from which they were removed, but staples, clips, rubber bands, etc. will not be reapplied. Rather, color-coded prep sheets will be included within the returned documents, and the prep sheets will contain markings evidencing the type of fastener that the LTSC removed.

- **LTSC RETENTION PRACTICES MANDATE PROMPT NOTIFICATIONS OF CHANGE REQUESTS:** The LTSC retains only temporarily the documents and electronic data that Districts provide to the LTSC, as well as the electronic data that the LTSC generates in connection with processing those materials. As a result, if you require modifications to an LTSC deliverable, *you must make the modification request as soon as possible, and in no event later than 60 days of the fulfillment of your request.* If you send the LTSC hard copy documents, the LTSC will return those documents to you. If you provide the LTSC electronic data on physical storage media (e.g., hard drives, CDs, etc.), the LTSC will return that physical storage media (with the data) to you. If you provide electronic data to the LTSC by copying the data to the LTSC's District file share, the data copied to the share will not be returned to you. Rather, data copied to the District file share will be deleted quickly—typically immediately after the data has been staged. In addition, all data the LTSC generates when processing hard copy documents or electronic data, *except data a District has requested be loaded into a hosting platform (i.e., Relativity or iCONNECT)*, will be removed from LTSC servers within 60 days of the fulfillment of your service request. Therefore, if you require modifications to an LTSC deliverable, it is imperative that you notify the LTSC as soon as possible, and in no event later than 60 days of the fulfillment of your request. If you do not make modification requests within 60 days, a modification request will not receive priority over the LTSC's current workload, and you will have to submit a new Preliminary Work Order, send the documents or electronic data to the LTSC again, and allow for the time needed for the LTSC to re-do all its prior processing work.

Czapko, Daniel (USAMN)

From: USALTSC-Coordiators
Sent: Wednesday, June 8, 2016 4:28 PM
To: Czapko, Daniel (USAMN); USALTSC-Coordiators
Cc: Zeitz, Mark (USAMN)
Subject: Edward Adams : C1948W10546(Ref#:01 Potential Privilege - All) : Work Has Begun

LTSC

EOUSA Litigation Technology Service Center

1600 Hampton Street, Room 207 - Columbia, SC 29208

Work Has Begun on Work Order "C1948W10546(Ref#:01 Potential Privilege - All)" for Case Name: "Edward Adams"
Work Due On: 6/10/2016

To: Dan Czapko

The LTSC has received all containers as expected. We will be processing 1 container of type: "Electronic Folder." We will be applying a label to each container received.

Each Electronic Folder will be processed with "Relativity Folder Updates" and the following tasks will be performed:

- Coordinator Review and Assign
- Create Hosting Job
- Move Documents
- Tech QC of Deliverable
- Coordinator QC/Sign-off

LTSC RETENTION PRACTICES MANDATE PROMPT NOTIFICATIONS OF CHANGE REQUESTS:

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LTSC's current workload, and you will have to submit a new Preliminary Work Order, send the documents or electronic data to the LTSC again, and allow for the time needed for the LTSC to re-do all its prior processing work.

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(803) 705-5432

Czapko, Daniel (USAMN)

From: USALTSC-Coordinators
Sent: Thursday, June 9, 2016 7:55 AM
To: Czapko, Daniel (USAMN); USALTSC-Coordinators
Cc: Zeitz, Mark (USAMN)
Subject: Edward Adams : C1948W10546(Ref#:01 Potential Privilege - All) : Work Order Completed

LTSC

EOUSA Litigation Technology Service Center

1600 Hampton Street, Room 207 - Columbia, SC 29208

Work Order Completed

Dear Dan:

Your service request for LTSC processing, work order #C1948W10546(Ref#:01 Potential Privilege - All), has been fulfilled.

Please see the note below from Marc Fulkert, who invites your feedback on the work recently completed by LTSC ([click here](#) to complete the online feedback form and also feel free to contact me directly):

As the Litigation Technology Service Center COR, I would greatly appreciate any / all feedback so that we may continually improve our effort to meet the eDiscovery and document imaging needs of all USAOs going forward.

LTSC RETENTION PRACTICES MANDATE PROMPT NOTIFICATIONS OF CHANGE REQUESTS:

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documents or electronic data to the LTSC again, and allow for the time needed for the LTSC to re-do all its prior processing work.

-Marc

Marc Fulkert, LTSC Managing Attorney
Litigation Technology Service Center COR
Office of the Chief Information Officer
Executive Office for United States Attorneys
Desk: (803) 705-5422

Czapko, Daniel (USAMN)

From: USALTSC-Coordiators
Sent: Thursday, June 9, 2016 12:55 PM
To: Czapko, Daniel (USAMN)
Subject: Edward Adams: LTSC Spec Sheet Received – NO ACTION REQUIRED

LTSC

EOUSA Litigation Technology Service Center

1600 Hampton Street, Room 207 - Columbia, SC 29208

Edward Adams: LTSC Spec Sheet Received

Thank you for your submission. We have received your Spec Sheet, and once we have analyzed your request we will send you an LWP as confirmation. A coordinator will reach out to you if we have any questions.

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(803) 705-5432

Czapko, Daniel (USAMN)

From: Czapko, Daniel (USAMN)
Sent: Thursday, June 9, 2016 2:43 PM
To: USALTSC-Coordinators
Cc: Zeitz, Mark (USAMN)
Subject: RE: Edward Adams : C1948W10575(Ref#:refolder) : LWP Approval Request – ACTION REQUIRED

Approve!

Thanks,
Dan Czapko

From: USALTSC-Coordinators
Sent: Thursday, June 09, 2016 2:36 PM
To: Czapko, Daniel (USAMN); USALTSC-Coordinators
Cc: Zeitz, Mark (USAMN)
Subject: Edward Adams : C1948W10575(Ref#:refolder) : LWP Approval Request – ACTION REQUIRED
Importance: High

LTSC
EOUSA Litigation Technology Service Center
1600 Hampton Street, Room 207 - Columbia, SC 29208

LTSC Litigation Work Plan Approval Request

Work Order: C1948W10575(Ref#:refolder)
Case Name: Edward Adams
Work Due On: 6/14/2016

To: Dan Czapko

Thank you for submitting a Preliminary Work Order (PWO) to EOUSA's Litigation Technology Service Center (LTSC). After reviewing your PWO, we request your approval of the following proposed Litigation Work Plan (LWP).

Please read the following Summary of Work and Important Notices below **carefully**. The Summary of Work describes exactly how your Work Order will be fulfilled. Make sure that the Summary of Work is **accurate** and **complete**. Please also make sure you have read and understand the Important Notices below.

If you approve this LWP as it is written, please reply to this email and type "Approve" in the response.

If there is any change needed to this LWP as it is written, please reply to this email with updates needed in the response.

For LTSC Container #45485:

In the Edward Adams_II workspace, documents in the results of saved search "01 Potential Privilege - All" will be moved to the secured folder "Not For Review". The folder will only be available to the LTSC.

Summary of Work

For work order "C1948W10575(Ref#:refolder)," we will be processing 1 container of the following type: "Electronic Folder." We will be applying a label to each container received.

1 Electronic Folder will be processed with "Relativity Folder Updates" and the following tasks will be performed:

- Coordinator Review and Assign
- Move Documents
- Tech QC of Deliverable
- Coordinator QC/Sign-off

The following hosting jobs will be completed:

- **W10575-20099:** 0.00 GB consisting of 1018 docs, 0 pages, and 0 native files loaded to Relativity

+++++

IMPORTANT NOTICES: READ BEFORE APPROVING

• **SECURE SHIPPING PROCEDURES:** Before you ship materials to the LTSC, please note that the LTSC requires strict compliance with the [Secure Shipping USAP, No. 3-13.200.005](#), and noncompliance may result in loss or damage to sensitive materials and require the filing of a formal Security Incident Report with your District Office Security Manager (DOSM) and others in accordance with the [LTSC USAP, No. 3-16.000.002 \(Part 6.B, "Project Security"\)](#). The Secure Shipping USAP mandates the use of either the new FedEx Secure Shipping Admin web portal or Registered Mail on all shipments of information protected from disclosure by law. Furthermore, such shipments must be packaged in accordance with the Secure Shipping USAP's dual-container requirements – using the special secure shipping tape/labels identified in USAP Attachment 1 as appropriate – and you must provide the LTSC with your shipment's tracking number(s) prior to shipping your materials. Also note that Electronically Stored Information (ESI) must be copied and encrypted per the LTSC USAP before shipment (do not send original ESI). Please contact your LTSC Project Coordinator for more information, and carefully review the [LTSC Shipping Requirements](#) for tips regarding how to securely ship your materials.

• **HARD COPY REASSEMBLY:** For projects involving the scanning of hard copy documents, the LTSC provides "physical unitization" services by inserting prep sheets : (1) where there are physical breaks among materials (e.g., staples, clips, rubber bands, etc); or (2) pursuant to clearly specified box/folder instructions from the District. Upon completion, documents will be returned to the folder/binder/etc from which they were removed, but staples, clips, rubber bands, etc. will not be reapplied. Rather, color-coded prep sheets will be included within the returned documents, and the prep sheets will contain markings evidencing the type of fastener that the LTSC removed.

- **LTSC RETENTION PRACTICES MANDATE PROMPT NOTIFICATIONS OF**

CHANGE REQUESTS: The LTSC retains only temporarily the documents and electronic data that Districts provide to the LTSC, as well as the electronic data that the LTSC generates in connection with processing those materials. As a result, if you require modifications to an LTSC deliverable, you must make the modification request as soon as possible, and in no event later than 60 days of the fulfillment of your request. If you send the LTSC hard copy documents, the LTSC will return those documents to you. If you provide the LTSC electronic data on physical storage media (e.g., hard drives, CDs, etc.), the LTSC will return that physical storage media (with the data) to you. If you provide electronic data to the LTSC by copying the data to the LTSC's District file share, the data copied to the share will not be returned to you. Rather, data copied to the District file share will be deleted quickly—typically immediately after the data has been staged. In addition, all data the LTSC generates when processing hard copy documents or electronic data, *except data a District has requested be loaded into a hosting platform (i.e., Relativity or iCONNECT)*, will be removed from LTSC servers within 60 days of the fulfillment of your service request. Therefore, if you require modifications to an LTSC deliverable, it is imperative that you notify the LTSC as soon as possible, and in no event later than 60 days of the fulfillment of your request. If you do not make modification requests within 60 days, a modification request will not receive priority over the LTSC's current workload, and you will have to submit a new Preliminary Work Order, send the documents or electronic data to the LTSC again, and allow for the time needed for the LTSC to re-do all its prior processing work.

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(803) 705-5432

Czapko, Daniel (USAMN)

From: USALTSC-Coordinators
Sent: Friday, June 10, 2016 7:34 AM
To: Czapko, Daniel (USAMN); USALTSC-Coordinators
Cc: Zeitz, Mark (USAMN)
Subject: Edward Adams : C1948W10575(Ref#:refolder) : Work Order Completed

LTSC
EOUSA Litigation Technology Service Center
1600 Hampton Street, Room 207 - Columbia, SC 29208

Work Order Completed

Dear Dan:

Your service request for LTSC processing, work order #C1948W10575(Ref#:refolder), has been fulfilled.

Please see the note below from Marc Fulkert, who invites your feedback on the work recently completed by LTSC ([click here](#) to complete the online feedback form and also feel free to contact me directly):

As the Litigation Technology Service Center COR, I would greatly appreciate any / all feedback so that we may continually improve our effort to meet the eDiscovery and document imaging needs of all USAOs going forward.

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documents or electronic data to the LTSC again, and allow for the time needed for the LTSC to redo all its prior processing work.

-Marc

Marc Fulkert, LTSC Managing Attorney
Litigation Technology Service Center COR
Office of the Chief Information Officer
Executive Office for United States Attorneys
Desk: (803) 705-5422

Czapko, Daniel (USAMN)

From: USALTSC-Coordinators
Sent: Friday, June 10, 2016 6:20 AM
To: Czapko, Daniel (USAMN); USALTSC-Coordinators
Cc: Zeitz, Mark (USAMN)
Subject: Edward Adams : C1948W10575(Ref#:refolder) : Work Has Begun

LTSC

EOUSA Litigation Technology Service Center

1600 Hampton Street, Room 207 - Columbia, SC 29208

Work Has Begun on Work Order "C1948W10575(Ref#:refolder)" for Case Name: "Edward Adams"

Work Due On: 6/14/2016

To: Dan Czapko

The LTSC has received all containers as expected. We will be processing 1 container of type: "Electronic Folder." We will be applying a label to each container received.

Each Electronic Folder will be processed with "Relativity Folder Updates" and the following tasks will be performed:

- Coordinator Review and Assign
- Move Documents
- Tech QC of Deliverable
- Coordinator QC/Sign-off

LTSC RETENTION PRACTICES MANDATE PROMPT NOTIFICATIONS OF CHANGE REQUESTS:

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(803) 705-5432

Czapko, Daniel (USAMN)

From: Czapko, Daniel (USAMN)
Sent: Friday, June 10, 2016 12:29 PM
To: Maria, David (USAMN) 1
Subject: RE: Adams Relativity Database

David,

These have been put into the Do Not Review folder, available only to the LTSC.

Thanks,
Dan

From: Maria, David (USAMN) 1
Sent: Monday, June 06, 2016 10:09 AM
To: Czapko, Daniel (USAMN)
Subject: Adams Relativity Database

Dan,

Can we run a search on the Relativity database for Adams (the one that they created at the LTSC with the Yahoo emails) for the following terms and then have any documents that hit segregated from the database and put into the database that will not be reviewed:

arnstein (and @arnstein.com)
felhaber (and @felhaber.com)
hopeman
amslaw
blandrichter (and @blandrichter.com)
tamburino
caplanlaw (and @caplanlaw.com)
brever

Please let me know if you have any questions.

Thanks,
David

Czapko, Daniel (USAMN)

From: Czapko, Daniel (USAMN)
Sent: Monday, September 12, 2016 9:52 AM
To: Dillon, Robin (USALTSC) [Contractor]
Subject: Add user to Relativity workspace

Robin,

Please add Cory Peterson to the Edward Adams II workspace for USAOMN. (Is there a way I can see if she's in, or do I have to ask you guys?)

Let me know if you have any questions!

Thanks,
Dan

Daniel Czapko | Litigation Support Specialist
U.S Attorney's Office | District of Minnesota
600 U.S Courthouse | 300 South Fourth Street | Minneapolis, MN 55415
612-664-5790 | daniel.czapko@usdoj.gov

Czapko, Daniel (USAMN)

From: Czapko, Daniel (USAMN)
Sent: Monday, September 12, 2016 10:01 AM
To: Maria, David (USAMN) 1; Zeitz, Mark (USAMN)
Cc: Petersen, Coryn (USAMN)
Subject: RE: Adams -- Relativity

I asked the LTSC to add her. I'll let you know when this is done.

Thanks,
Dan

From: Maria, David (USAMN) 1
Sent: Monday, September 12, 2016 9:25 AM
To: Zeitz, Mark (USAMN); Czapko, Daniel (USAMN)
Cc: Petersen, Coryn (USAMN)
Subject: Adams -- Relativity

Mark/Dan,

Can you please provide Cori with access to the Relativity databases in the Adams matter.

Thanks.

David M. Maria
Assistant United States Attorney
District of Minnesota, Criminal Division
600 U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415
V: 612.664.5681 | F: 612.664.5787

Czapko, Daniel (USAMN)

From: Czapko, Daniel (USAMN)
Sent: Monday, September 12, 2016 10:04 AM
To: Maria, David (USAMN) 1; Zeitz, Mark (USAMN)
Cc: Petersen, Coryn (USAMN)
Subject: RE: Adams -- Relativity

She has been added to the Edward Adams II project.

Dan

From: Maria, David (USAMN) 1
Sent: Monday, September 12, 2016 9:25 AM
To: Zeitz, Mark (USAMN); Czapko, Daniel (USAMN)
Cc: Petersen, Coryn (USAMN)
Subject: Adams -- Relativity

Mark/Dan,

Can you please provide Cori with access to the Relativity databases in the Adams matter.

Thanks.

David M. Maria
Assistant United States Attorney
District of Minnesota, Criminal Division
600 U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415
V: 612.664.5681 | F: 612.664.5787

Czapko, Daniel (USAMN)

From: Czapko, Daniel (USAMN)
Sent: Monday, September 12, 2016 11:53 AM
To: Dillon, Robin (USALTSC) [Contractor]
Subject: RE: Add user to Relativity workspace

Ahh, I see. You guys trust me, just not my office.

From: Dillon, Robin (USALTSC) [Contractor]
Sent: Monday, September 12, 2016 11:51 AM
To: Czapko, Daniel (USAMN)
Subject: RE: Add user to Relativity workspace

Admin permissions in Relativity—not your network access.

Robin Dillon

Litigation Technology Specialist
Deloitte (Contractor)
Litigation Technology Service Center (LTSC)
Department of Justice/EOUSA
1600 Hampton Street, Suite 207
Columbia, SC 29208-9997
Office: 803-705-5389

From: Czapko, Daniel (USAMN)
Sent: Monday, September 12, 2016 12:49 PM
To: Dillon, Robin (USALTSC) [Contractor] <rdillon@usa.doj.gov>
Subject: RE: Add user to Relativity workspace

Oh, they don't trust me with Admin access... ☹

From: Dillon, Robin (USALTSC) [Contractor]
Sent: Monday, September 12, 2016 10:30 AM
To: Czapko, Daniel (USAMN)
Subject: RE: Add user to Relativity workspace

It would have to be someone with Admin access to get the information even in the indirect method. We certainly don't mind looking it up as that only takes a minute and it's always nice to chat with the MN crew.

Thanks!

Robin Dillon

Litigation Technology Specialist

Deloitte (Contractor)
Litigation Technology Service Center (LTSC)
Department of Justice/EOUSA
1600 Hampton Street, Suite 207
Columbia, SC 29208-9997
Office: 803-705-5389

From: Czapko, Daniel (USAMN)
Sent: Monday, September 12, 2016 11:19 AM
To: Dillon, Robin (USALTSC) [Contractor] <rdillon@usa.doj.gov>
Subject: RE: Add user to Relativity workspace

Probably not. If they're asking for it, I'm guessing they don't have access. Plus it gives me a chance to chat with you guys.
☺

From: Dillon, Robin (USALTSC) [Contractor]
Sent: Monday, September 12, 2016 10:13 AM
To: Czapko, Daniel (USAMN)
Subject: RE: Add user to Relativity workspace

I can walk you through the indirect method if you want. It has to do with going to look at security for a particular field. Nothing hard just not a very direct way of getting the information.

Robin Dillon
Litigation Technology Specialist
Deloitte (Contractor)
Litigation Technology Service Center (LTSC)
Department of Justice/EOUSA
1600 Hampton Street, Suite 207
Columbia, SC 29208-9997
Office: 803-705-5389

From: Czapko, Daniel (USAMN)
Sent: Monday, September 12, 2016 11:04 AM
To: Dillon, Robin (USALTSC) [Contractor] <rdillon@usa.doj.gov>
Subject: RE: Add user to Relativity workspace

Great. Thanks! (I think I asked you this before and got the same answer.)
Dan

From: Dillon, Robin (USALTSC) [Contractor]
Sent: Monday, September 12, 2016 10:03 AM
To: Czapko, Daniel (USAMN)
Subject: RE: Add user to Relativity workspace

Hi Dan.

I've added Cory to the Edward Adams_II workspace. There is technically a way you can view users in a workspace but it's not a direct way of getting the information. Usually it's just easier to email the coordinators or ping me.

Thanks!

Robin Dillon

Litigation Technology Specialist
Deloitte (Contractor)
Litigation Technology Service Center (LTSC)
Department of Justice/EOUSA
1600 Hampton Street, Suite 207
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Office: 803-705-5389

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Subject: Add user to Relativity workspace

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Let me know if you have any questions!

Thanks,
Dan

Daniel Czapko | Litigation Support Specialist
U.S Attorney's Office | District of Minnesota
600 U.S Courthouse | 300 South Fourth Street | Minneapolis, MN 55415
612-664-5790 | daniel.czapko@usdoj.gov

Czapko, Daniel (USAMN)

From: Czapko, Daniel (USAMN)
Sent: Monday, September 12, 2016 11:55 AM
To: Dillon, Robin (USALTSC) [Contractor]
Subject: RE: Add user to Relativity workspace

Thanks!
Dan

From: Dillon, Robin (USALTSC) [Contractor]
Sent: Monday, September 12, 2016 11:55 AM
To: Czapko, Daniel (USAMN)
Subject: RE: Add user to Relativity workspace

Done.

Robin Dillon
Litigation Technology Specialist
Deloitte (Contractor)
Litigation Technology Service Center (LTSC)
Department of Justice/EOUSA
1600 Hampton Street, Suite 207
Columbia, SC 29208-9997
Office: 803-705-5389

From: Czapko, Daniel (USAMN)
Sent: Monday, September 12, 2016 12:54 PM
To: Dillon, Robin (USALTSC) [Contractor] <rdillon@usa.doj.gov>
Subject: RE: Add user to Relativity workspace

Back to work though.

Could you also add Cory Petersen to the regular Edward Adams workspace?

Thanks,
Dan

From: Dillon, Robin (USALTSC) [Contractor]
Sent: Monday, September 12, 2016 11:51 AM
To: Czapko, Daniel (USAMN)
Subject: RE: Add user to Relativity workspace

Admin permissions in Relativity—not your network access.

Robin Dillon

Litigation Technology Specialist
Deloitte (Contractor)
Litigation Technology Service Center (LTSC)
Department of Justice/EOUSA
1600 Hampton Street, Suite 207
Columbia, SC 29208-9997
Office: 803-705-5389

From: Czapko, Daniel (USAMN)
Sent: Monday, September 12, 2016 12:49 PM
To: Dillon, Robin (USALTSC) [Contractor] <rdillon@usa.doj.gov>
Subject: RE: Add user to Relativity workspace

Oh, they don't trust me with Admin access... ☹

From: Dillon, Robin (USALTSC) [Contractor]
Sent: Monday, September 12, 2016 10:30 AM
To: Czapko, Daniel (USAMN)
Subject: RE: Add user to Relativity workspace

It would have to be someone with Admin access to get the information even in the indirect method. We certainly don't mind looking it up as that only takes a minute and it's always nice to chat with the MN crew.

Thanks!

Robin Dillon

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Deloitte (Contractor)
Litigation Technology Service Center (LTSC)
Department of Justice/EOUSA
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Columbia, SC 29208-9997
Office: 803-705-5389

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To: Dillon, Robin (USALTSC) [Contractor] <rdillon@usa.doj.gov>
Subject: RE: Add user to Relativity workspace

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☺

From: Dillon, Robin (USALTSC) [Contractor]
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To: Czapko, Daniel (USAMN)
Subject: RE: Add user to Relativity workspace

I can walk you through the indirect method if you want. It has to do with going to look at security for a particular field. Nothing hard just not a very direct way of getting the information.

Robin Dillon

Litigation Technology Specialist
Deloitte (Contractor)
Litigation Technology Service Center (LTSC)
Department of Justice/EOUSA
1600 Hampton Street, Suite 207
Columbia, SC 29208-9997
Office: 803-705-5389

From: Czapko, Daniel (USAMN)
Sent: Monday, September 12, 2016 11:04 AM
To: Dillon, Robin (USALTSC) [Contractor] <rdillon@usa.doj.gov>
Subject: RE: Add user to Relativity workspace

Great. Thanks! (I think I asked you this before and got the same answer.)
Dan

From: Dillon, Robin (USALTSC) [Contractor]
Sent: Monday, September 12, 2016 10:03 AM
To: Czapko, Daniel (USAMN)
Subject: RE: Add user to Relativity workspace

Hi Dan,

I've added Cory to the Edward Adams_II workspace. There is technically a way you can view users in a workspace but it's not a direct way of getting the information. Usually it's just easier to email the coordinators or ping me.

Thanks!

Robin Dillon

Litigation Technology Specialist
Deloitte (Contractor)
Litigation Technology Service Center (LTSC)
Department of Justice/EOUSA
1600 Hampton Street, Suite 207
Columbia, SC 29208-9997
Office: 803-705-5389

From: Czapko, Daniel (USAMN)
Sent: Monday, September 12, 2016 10:52 AM
To: Dillon, Robin (USALTSC) [Contractor] <rdillon@usa.doj.gov>
Subject: Add user to Relativity workspace

Robin,

Please add Cory Peterson to the Edward Adams II workspace for USAOMN. (Is there a way I can see if she's in, or do I have to ask you guys?)

Let me know if you have any questions!

Thanks,
Dan

Daniel Czapko | Litigation Support Specialist
U.S Attorney's Office | District of Minnesota
600 U.S Courthouse | 300 South Fourth Street | Minneapolis, MN 55415
612-664-5790 | daniel.czapko@usdoj.gov

Czapko, Daniel (USAMN)

From: Petersen, Coryn (USAMN)
Sent: Monday, September 12, 2016 12:01 PM
To: Czapko, Daniel (USAMN)
Subject: RE: Adams -- Relativity

thanks

From: Czapko, Daniel (USAMN)
Sent: Monday, September 12, 2016 11:56 AM
To: Petersen, Coryn (USAMN)
Subject: RE: Adams -- Relativity

You've been added.
Dan

From: Petersen, Coryn (USAMN)
Sent: Monday, September 12, 2016 10:52 AM
To: Czapko, Daniel (USAMN)
Subject: RE: Adams -- Relativity

Hey Dan,

I think there are two projects. Can I gain access to the other?

From: Czapko, Daniel (USAMN)
Sent: Monday, September 12, 2016 10:04 AM
To: Maria, David (USAMN) 1; Zeitz, Mark (USAMN)
Cc: Petersen, Coryn (USAMN)
Subject: RE: Adams -- Relativity

She has been added to the Edward Adams II project.

Dan

From: Maria, David (USAMN) 1
Sent: Monday, September 12, 2016 9:25 AM
To: Zeitz, Mark (USAMN); Czapko, Daniel (USAMN)
Cc: Petersen, Coryn (USAMN)
Subject: Adams -- Relativity

Mark/Dan,

Can you please provide Cori with access to the Relativity databases in the Adams matter.

Thanks.

David M. Maria
Assistant United States Attorney
District of Minnesota, Criminal Division

600 U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415
V: 612.664.5681 | F: 612.664.5787

Czapko, Daniel (USAMN)

From: Petersen, Coryn (USAMN)
Sent: Monday, September 12, 2016 12:28 PM
To: Maria, David (USAMN) 1; Zeitz, Mark (USAMN); Czapko, Daniel (USAMN)
Subject: RE: Adams -- Relativity

I've got access to both. Thanks.

From: Maria, David (USAMN) 1
Sent: Monday, September 12, 2016 9:25 AM
To: Zeitz, Mark (USAMN); Czapko, Daniel (USAMN)
Cc: Petersen, Coryn (USAMN)
Subject: Adams -- Relativity

Mark/Dan,

Can you please provide Cori with access to the Relativity databases in the Adams matter.

Thanks.

David M. Maria
Assistant United States Attorney
District of Minnesota, Criminal Division
600 U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415
V: 612.664.5681 | F: 612.664.5787

Czapko, Daniel (USAMN)

From: Maria, David (USAMN) 1
Sent: Monday, October 17, 2016 2:06 PM
To: Czapko, Daniel (USAMN)
Subject: RE: Adams database

Sure. Thanks.

From: Czapko, Daniel (USAMN)
Sent: Monday, October 17, 2016 12:59 PM
To: Maria, David (USAMN) 1 <dmaria1@usa.doj.gov>
Subject: Re: Adams database

David,
I am in St. Paul today and probably most of tomorrow. Can I look at this on Wednesday?
Dan

Sent from my iPhone

On Oct 17, 2016, at 9:52 AM, Maria, David (USAMN) 1 <dmaria1@usa.doj.gov> wrote:

Dan—

In reviewing emails on the Edward Adams II database, I'm noticing a few emails that went to an associate at the Adams Monahan law firm – the email address is cmumm@adamsmonahan.com.

When we did the first run of search terms to exclude potentially privileged emails from the database, adamsmonahan.com and adamsmonahan were both search terms. Can we figure out why it didn't capture some of these? We also need to run that one again and pull any hits.

Thanks.

David M. Maria
Assistant United States Attorney
District of Minnesota, Criminal Division
600 U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415
V: 612.664.5681 | F: 612.664.5787

Czapko, Daniel (USAMN)

From: USALTSC-Coordiators
Sent: Wednesday, October 19, 2016 10:53 AM
To: Czapko, Daniel (USAMN)
Subject: Edward Adams: LTSC Spec Sheet Received – NO ACTION REQUIRED

LTSC***EOUSA Litigation Technology Service Center***

1600 Hampton Street, Room 207 - Columbia, SC 29208

Edward Adams: LTSC Spec Sheet #4246 received

Thank you for your submission. We have received your Spec Sheet, and once we have analyzed your request we will send you an LWP as confirmation. A coordinator will reach out to you if we have any questions.

Spec Sheet Main Information

District	MN - Minnesota
District POC	Dan Czapko Daniel.Czapko@usdoj.gov 612-664-5790
AUSA POC	David Maria david.maria@usdoj.gov 612-664-5600
Case	Edward Adams (White Collar Crime)
Project Type	No Case Filed (pre-indictment or investigatory matter)
Court Type	Criminal
Conflict of Interest	Edward Adams, Michael Monahan
Deadline	10/24/2016 12:00:00 AM (Internal)
Customer Has	The following searches have been revised to include Family, Fuzziness, and Stemming if they were not already included, and to specify the folder level to be searched:00 Potential Privilege - All00 Potential Privilege - General Terms00 Potential Privilege - Specific Terms01 Potential Privilege - All
Requested Deliverable	Please move any hits to the Taint Review folder.
Special Instructions	***This is in the Edward Adams II project.***Contact Dan Czapko - 612-664-5790 with any questions

Relativity Administration Information

Near Dupe Analysis:	No
Email Thread Analysis:	No

Content Analyst Index: No

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(803) 705-5432

Czapko, Daniel (USAMN)

From: Czapko, Daniel (USAMN)
Sent: Wednesday, October 19, 2016 1:43 PM
To: USALTSC-Coordinators
Cc: Zeitz, Mark (USAMN)
Subject: RE: Edward Adams : C1948W11913(Ref#:move documents to Taint Review) : LWP Approval Request – ACTION REQUIRED

Approve.

Thanks,
Dan Czapko

From: USALTSC-Coordinators
Sent: Wednesday, October 19, 2016 1:38 PM
To: Czapko, Daniel (USAMN) <dczapko@usa.doj.gov>; USALTSC-Coordinators <USALTSC-Coordinators@usa.doj.gov>
Cc: Zeitz, Mark (USAMN) <mzeitz@usa.doj.gov>
Subject: Edward Adams : C1948W11913(Ref#:move documents to Taint Review) : LWP Approval Request – ACTION REQUIRED
Importance: High

LTSC

EOUSA Litigation Technology Service Center

1600 Hampton Street, Room 207 - Columbia, SC 29208

LTSC Litigation Work Plan Approval Request

Work Order: C1948W11913(Ref#:move documents to Taint Review)
Case Name: Edward Adams
Work Due On: 10/24/2016

To: Dan Czapko

Thank you for submitting a work request to EOUSA's Litigation Technology Service Center (LTSC). After reviewing your request, we ask your approval of the following proposed Litigation Work Plan (LWP).

Please read the following Summary of Work and Important Notices below **carefully**. The Summary of Work describes exactly how your Work Order will be fulfilled. Make sure that the Summary of Work is **accurate** and **complete**. Please also make sure you have read and understand the Important Notices below.

If you approve this LWP as it is written, please reply to this email and type "Approve" in the response.

If there is any change needed to this LWP as it is written, please reply to this email with updates needed in the response.

For LTSC Container #47717:

LTSC will move the 105,185 documents in the saved search W11913_Taint Review to the secured Taint Review folder.

Saved search W11913_Taint Review includes the results from the following saved searches:

- 00 Potential Privilege - All
- 00 Potential Privilege - General Terms
- 00 Potential Privilege - Specific Terms
- 01 Potential Privilege - All

Summary of Work

For work order "C1948W11913(Ref#:move documents to Taint Review)," we will be processing 1 container of the following type: "Electronic Folder." We will be applying a label to each container received.

1 Electronic Folder will be processed with "Relativity Folder Updates" and the following tasks will be performed:

- Coordinator Review and Assign
- Create Hosting Job
- Move Documents
- Tech QC of Deliverable
- Coordinator QC/Sign-off

Jobs

Hosting Jobs

The following hosting jobs will be completed:

- W11913-22128: 0.00 GB consisting of 105185 docs, 0 pages, and 0 native files loaded to Relativity database "Edward Adams_II"

+++++ IMPORTANT NOTICES: READ BEFORE APPROVING

• **SECURE SHIPPING PROCEDURES:** Before you ship materials to the LTSC, please note that the LTSC requires strict compliance with the [Secure Shipping USAP, No. 3-13.200.005](#), and noncompliance may result in loss or damage to sensitive materials and require the filing of a formal Security Incident Report with your District Office Security Manager (DOSM) and others in accordance with the [LTSC USAP, No. 3-16.000.002 \(Part 6.B, "Project Security"\)](#). The Secure Shipping USAP mandates the use of either the new FedEx Secure Shipping Admin web portal or Registered Mail on all shipments of information protected from disclosure by law. Furthermore, such shipments must be packaged in accordance with the Secure Shipping USAP's dual-container requirements – using the special secure shipping tape/labels identified in USAP Attachment 1 as

appropriate – and you must provide the LTSC with your shipment's tracking number(s) prior to shipping your materials. Also note that Electronically Stored Information (ESI) must be copied and encrypted per the LTSC USAP before shipment (do not send original ESI). Please contact your LTSC Project Coordinator for more information, and carefully review the [LTSC Shipping Requirements](#) for tips regarding how to securely ship your materials.

- **HARD COPY REASSEMBLY:** For projects involving the scanning of hard copy documents, the LTSC provides "physical unitization" services by inserting prep sheets : (1) where there are physical breaks among materials (e.g., staples, clips, rubber bands, etc); or (2) pursuant to clearly specified box/folder instructions from the District. Upon completion, documents will be returned to the folder/binder/etc from which they were removed, but staples, clips, rubber bands, etc. will not be reapplied. Rather, color-coded prep sheets will be included within the returned documents, and the prep sheets will contain markings evidencing the type of fastener that the LTSC removed.

- **LTSC RETENTION PRACTICES MANDATE PROMPT NOTIFICATIONS OF CHANGE REQUESTS:** The LTSC retains only temporarily the documents and electronic data that Districts provide to the LTSC, as well as the electronic data that the LTSC generates in connection with processing those materials. As a result, if you require modifications to an LTSC deliverable, you must make the modification request as soon as possible, and in no event later than 60 days of the fulfillment of your request. If you send the LTSC hard copy documents, the LTSC will return those documents to you. If you provide the LTSC electronic data on physical storage media (e.g., hard drives, CDs, etc.), the LTSC will return that physical storage media (with the data) to you. If you provide electronic data to the LTSC by copying the data to the LTSC's District file share, the data copied to the share will not be returned to you. Rather, data copied to the District file share will be deleted quickly—typically immediately after the data has been staged. In addition, all data the LTSC generates when processing hard copy documents or electronic data, *except data a District has requested be loaded into a hosting platform (i.e., Relativity or iCONNECT)*, will be removed from LTSC servers within 60 days of the fulfillment of your service request. Therefore, if you require modifications to an LTSC deliverable, it is imperative that you notify the LTSC as soon as possible, and in no event later than 60 days of the fulfillment of your request. If you do not make modification requests within 60 days, a modification request will not receive priority over the LTSC's current workload, and you will have to submit a new Preliminary Work Order, send the documents or electronic data to the LTSC again, and allow for the time needed for the LTSC to re-do all its prior processing work.

Czapko, Daniel (USAMN)

From: USALTSC-Coordiators
Sent: Wednesday, October 19, 2016 1:44 PM
To: Czapko, Daniel (USAMN); USALTSC-Coordiators
Cc: Zeitz, Mark (USAMN)
Subject: Edward Adams : C1948W11913(Ref#:move documents to Taint Review) : Work Has Begun

LTSC

EOUSA Litigation Technology Service Center

1600 Hampton Street, Room 207 - Columbia, SC 29208

Work Has Begun on Work Order "C1948W11913(Ref#:move documents to Taint Review)" for
Case Name: "Edward Adams"
Work Due On: 10/24/2016

To: Dan Czapko

The LTSC has received all containers as expected. We will be processing 1 container of type:
"Electronic Folder." We will be applying a label to each container received.

Each Electronic Folder will be processed with "Relativity Folder Updates" and the following tasks will be performed:

- Coordinator Review and Assign
- Create Hosting Job
- Move Documents
- Tech QC of Deliverable
- Coordinator QC/Sign-off

LTSC RETENTION PRACTICES MANDATE PROMPT NOTIFICATIONS OF CHANGE REQUESTS:

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modification requests within 60 days, a modification request will not receive priority over the LTSC's current workload, and you will have to submit a new Preliminary Work Order, send the documents or electronic data to the LTSC again, and allow for the time needed for the LTSC to re-do all its prior processing work.

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(803) 705-5432

Czapko, Daniel (USAMN)

From: USALTSC-Coordinators
Sent: Thursday, October 20, 2016 6:55 AM
To: Czapko, Daniel (USAMN); USALTSC-Coordinators
Cc: Zeitz, Mark (USAMN)
Subject: Edward Adams : C1948W11913(Ref#:move documents to Taint Review) : Work Order Completed

LTSC

EOUSA Litigation Technology Service Center

1600 Hampton Street, Room 207 - Columbia, SC 29208

Work Order Completed

Dear Dan:

Your service request for LTSC processing, work order #C1948W11913(Ref#:move documents to Taint Review), has been fulfilled.

Please see the note below from Marc Fulkert, who invites your feedback on the work recently completed by LTSC ([click here](#) to complete the online feedback form and also feel free to contact me directly):

As the Litigation Technology Service Center COR, I would greatly appreciate any / all feedback so that we may continually improve our effort to meet the eDiscovery and document imaging needs of all USAOs going forward.

LTSC RETENTION PRACTICES MANDATE PROMPT NOTIFICATIONS OF CHANGE REQUESTS: The LTSC retains only temporarily the documents and electronic data that Districts provide to the LTSC, as well as the electronic data that the LTSC generates in connection with processing those materials. As a result, if you require modifications to an LTSC deliverable, you must make the modification request as soon as possible, and in no event later than 60 days of the fulfillment of your request. If you send the LTSC hard copy documents, the LTSC will return those documents to you. If you provide the LTSC electronic data on physical storage media (e.g., hard drives, CDs, etc.), the LTSC will return that physical storage media (with the data) to you. If you provide electronic data to the LTSC by copying the data to the LTSC's District file share, the data copied to the share will not be returned to you. Rather, data copied to the District file share will be deleted quickly—typically immediately after the data has been staged. In addition, all data the LTSC generates when processing hard copy documents or electronic data, *except data a District has requested be loaded into a hosting platform (i.e., Relativity or iCONNECT)*, will be removed from LTSC servers within 60 days of the fulfillment of your service request. Therefore, if you require modifications to an LTSC deliverable, it is imperative that you notify the LTSC as soon as possible, and in no event later than 60 days of the fulfillment of your request. If you do not make modification requests within 60 days, a modification request will not receive priority over the LTSC's current workload, and you will have to submit a new Preliminary Work Order, send the

documents or electronic data to the LTSC again, and allow for the time needed for the LTSC to re-do all its prior processing work.

-Marc

Marc Fulkert, LTSC Managing Attorney
Litigation Technology Service Center COR
Office of the Chief Information Officer
Executive Office for United States Attorneys
Desk: (803) 705-5422

Czapko, Daniel (USAMN)

From: USALTSC-Coordiators
Sent: Monday, November 7, 2016 9:20 AM
To: Czapko, Daniel (USAMN)
Subject: Edward Adams: LTSC Spec Sheet Received – NO ACTION REQUIRED

LTSC***EOUSA Litigation Technology Service Center***

1600 Hampton Street, Room 207 - Columbia, SC 29208

Edward Adams: LTSC [Spec Sheet #4397](#) received

Thank you for your submission. We have received your Spec Sheet, and once we have analyzed your request we will send you an LWP as confirmation. A coordinator will reach out to you if we have any questions.

Spec Sheet Main Information

District	MN - Minnesota
District POC	Dan Czapko Daniel.Czapko@usdoj.gov 612-664-5790
AUSA POC	David Maria david.maria@usdoj.gov 612-664-5600
Case	Edward Adams (White Collar Crime)
Project Type	No Case Filed (pre-indictment or investigatory matter)
Court Type	Criminal
Conflict of Interest	Edward Adams, Michael Monahan
USAO Matter No	2014R00312
Deadline	11/11/2016 12:00:00 AM (Internal)
Customer Has	A search titled "Keep in Taint - Email Search" of the Taint Review folder in the Edward Adams II project.
Requested Deliverable	I have a search of the Taint Review folder that needs to be applied to the latest batch that was moved to the folder. Hit docs from the search should remain in the Taint Review folder. The rest of the last batch (that does NOT have hits) should be moved back to the Edward Adams II folder for review.
Special Instructions	Call/email with any questions.

Relativity Administration Information

Near Dupe Analysis: No

Email Thread Analysis: No

Content Analyst Index: No

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(803) 705-5432

Czapko, Daniel (USAMN)

From: Dillon, Robin (USALTSC) [Contractor]
Sent: Friday, November 4, 2016 1:00 PM
To: Czapko, Daniel (USAMN)
Subject: Edward Adams_II

Hi Dan.

As we discussed I've rebuilt the dtSearch index for this workspace to include email address recognition. I've copied a portion of the search guide below on how to search for email addresses using this syntax. Please let me know if you have any questions.

6.4.1.2 Email address recognition

Email address recognition searches for text with the syntax of a valid email address, such as "sales@example.com". With this feature, you can search for a specific email address regardless of the alphabet settings for "@", ".", or other punctuation in the email address.

You can also use the word listing functions in dtSearch to enumerate all email addresses in a document collection. Wildcard expressions are supported in this function:

- mail(sales@example.com)
- mail(sa*@example.com)

To search for an email address, enter an email address between the parentheses in "mail()".

Thanks!

Robin Dillon

Litigation Technology Specialist
Deloitte (Contractor)
Litigation Technology Service Center (LTSC)
Department of Justice/EOUSA
1600 Hampton Street, Suite 207
Columbia, SC 29208-9997
Office: 803-705-5389

Czapko, Daniel (USAMN)

From: Dillon, Robin (USALTSC) [Contractor]
Sent: Monday, November 7, 2016 12:54 PM
To: Czapko, Daniel (USAMN)
Subject: W12092 Edward Adams

Hi Dan.

Can you review the saved search W12092_Remove from Taint and ensure it contains on the documents you want moved from the Taint Review folder? Basically I took the items we moved in the last request (W11913) and added a condition that the document not appear in your Keep in Taint – Email Search. Once you review this and confirm the results I can send the LWP to move the 105,185 documents in the results. Let me know if you have any questions.

Thanks!

Robin Dillon
 Litigation Technology Specialist
 Deloitte (Contractor)
 Litigation Technology Service Center (LTSC)
 Department of Justice/EOUSA
 1600 Hampton Street, Suite 207
 Columbia, SC 29208-9997
 Office: 803-705-5389

From: USALTSC-Coordinators
Sent: Monday, November 7, 2016 10:20 AM
To: Johnson, Amanda K. (USALTSC) [Contractor] <ajohnson@usa.doj.gov>; Allen, Allison (USALTSC) [Contractor] <aallen2@usa.doj.gov>; Bellino, Anthony (USALTSC) [Contractor] <abellino@usa.doj.gov>; Basir, Jon (USALTSC) [Contractor] <JBasir@usa.doj.gov>; Carrano, Jonathan (USALTSC) [Contractor] <jcarrano@usa.doj.gov>; Acheampong, Jude O. (USALTSC) [Contractor] <jacheampong@usa.doj.gov>; Dillon, Robin (USALTSC) [Contractor] <rdillon@usa.doj.gov>; Anderson, Ruth (USALTSC) [Contractor] <rmanderson@usa.doj.gov>; Tucker, Sarah <stucker@usa.doj.gov>; Abraham, Suzanne L. (USALTSC) [Contractor] <SAbraham@usa.doj.gov>
Subject: Spec Sheet submitted for district Minnesota, case Edward Adams

Dear coordinator,

[Spec Sheet #4397](#) has been submitted or updated for district Minnesota, case Edward Adams. This spec sheet is associated to [LAWTICS Work Order #](#).

The submit/update was made by Dan Czapko.

Spec Sheet Main Information

District MN - Minnesota
District POC Dan Czapko
Daniel.Czapko@usdoj.gov
 612-664-5790

AUSA POC	David Maria david.maria@usdoj.gov 612-664-5600
Case	Edward Adams (White Collar Crime)
Project Type	No Case Filed (pre-indictment or investigatory matter)
Court Type	Criminal
Conflict of Interest	Edward Adams, Michael Monahan
USAO Matter No	2014R00312
Deadline	11/11/2016 12:00:00 AM (Internal)
Customer Has	A search titled "Keep in Taint - Email Search" of the Taint Review folder in the Edward Adams II project.
Requested Deliverable	I have a search of the Taint Review folder that needs to be applied to the latest batch that was moved to the folder. Hit docs from the search should remain in the Taint Review folder. The rest of the last batch (that does NOT have hits) should be moved back to the Edward Adams II folder for review.
Special Instructions	Call/email with any questions.

Relativity Administration Information

Near Dupe Analysis:	No
Email Thread Analysis:	No
Content Analyst Index:	No

Czapko, Daniel (USAMN)

From: Czapko, Daniel (USAMN)
Sent: Monday, November 7, 2016 1:13 PM
To: Dillon, Robin (USALTSC) [Contractor]
Subject: Edward Adams II

Robin,

I just got your message. Let me know when I can call you.

Thanks,
Dan

Daniel Czapko | Litigation Support Specialist
U.S. Attorney's Office | District of Minnesota
600 U.S. Courthouse | 300 South Fourth Street
Minneapolis, MN 55415
612-664-5790 | daniel.czapko@usdoj.gov

Czapko, Daniel (USAMN)

From: USALTSC-Coordinators
Sent: Monday, November 7, 2016 2:39 PM
To: Czapko, Daniel (USAMN); USALTSC-Coordinators
Cc: USAMN-Criminal ALS
Subject: Edward Adams : C1948W12092(Ref#:W12092_Remove from Taint) : LWP Approval Request – ACTION REQUIRED

Importance: High

LTSC
EOUSA Litigation Technology Service Center
1600 Hampton Street, Room 207 - Columbia, SC 29208

LTSC Litigation Work Plan Approval Request

Work Order: C1948W12092(Ref#:W12092_Remove from Taint)
Case Name: Edward Adams
Work Due On: 11/9/2016

To: Dan Czapko

Thank you for submitting a work request to EOUSA's Litigation Technology Service Center (LTSC). After reviewing your request, we ask your approval of the following proposed Litigation Work Plan (LWP).

Please read the following Summary of Work and Important Notices below **carefully**. The Summary of Work describes exactly how your Work Order will be fulfilled. Make sure that the Summary of Work is **accurate** and **complete**. Please also make sure you have read and understand the Important Notices below.

If you approve this LWP as it is written, please reply to this email and type "Approve" in the response.

If there is any change needed to this LWP as it is written, please reply to this email with updates needed in the response.

For LTSC Container #48045:

The LTSC will move documents in the results of saved search 'W12092_Remove from Taint' into the unsecured Edward Adams_II folder.

There are 105,185 items in the saved search.

Summary of Work

For work order "C1948W12092(Ref#:W12092_Remove from Taint)," we will be processing 1 container of the following type: "Electronic Folder." We will be applying a label to each container

received.

1 Electronic Folder will be processed with "Relativity Folder Updates" and the following tasks will be performed:

- Coordinator Review and Assign
- Create Hosting Job
- Move Documents
- Tech QC of Deliverable
- Coordinator QC/Sign-off

Jobs

Hosting Jobs

The following hosting jobs will be completed:

- W12092-22445: 0.00 GB consisting of 105185 docs, 0 pages, and 0 native files loaded to Relativity database "Edward Adams_II"

+++++

IMPORTANT NOTICES: READ BEFORE APPROVING

• **SECURE SHIPPING PROCEDURES:** Before you ship materials to the LTSC, please note that the LTSC requires strict compliance with the [Secure Shipping USAP, No. 3-13.200.005](#), and noncompliance may result in loss or damage to sensitive materials and require the filing of a formal Security Incident Report with your District Office Security Manager (DOSM) and others in accordance with the [LTSC USAP, No. 3-16.000.002 \(Part 6.B, "Project Security"\)](#). The Secure Shipping USAP mandates the use of either the new FedEx Secure Shipping Admin web portal or Registered Mail on all shipments of information protected from disclosure by law. Furthermore, such shipments must be packaged in accordance with the Secure Shipping USAP's dual-container requirements – using the special secure shipping tape/labels identified in USAP Attachment 1 as appropriate – and you must provide the LTSC with your shipment's tracking number(s) prior to shipping your materials. Also note that Electronically Stored Information (ESI) must be copied and encrypted per the LTSC USAP before shipment (do not send original ESI). Please contact your LTSC Project Coordinator for more information, and carefully review the [LTSC Shipping Requirements](#) for tips regarding how to securely ship your materials.

• **HARD COPY REASSEMBLY:** For projects involving the scanning of hard copy documents, the LTSC provides "physical unitization" services by inserting prep sheets : (1) where there are physical breaks among materials (e.g., staples, clips, rubber bands, etc); or (2) pursuant to clearly specified box/folder instructions from the District. Upon completion, documents will be returned to the folder/binder/etc from which they were removed, but staples, clips, rubber bands, etc. will not be reapplied. Rather, color-coded prep sheets will be included within the returned documents, and the prep sheets will contain markings evidencing the type of fastener that the LTSC removed.

• **LTSC RETENTION PRACTICES MANDATE PROMPT NOTIFICATIONS OF CHANGE REQUESTS:** The LTSC retains only temporarily the documents and electronic data that

Districts provide to the LTSC, as well as the electronic data that the LTSC generates in connection with processing those materials. As a result, if you require modifications to an LTSC deliverable, you must make the modification request as soon as possible, and in no event later than 60 days of the fulfillment of your request. If you send the LTSC hard copy documents, the LTSC will return those documents to you. If you provide the LTSC electronic data on physical storage media (e.g., hard drives, CDs, etc.), the LTSC will return that physical storage media (with the data) to you. If you provide electronic data to the LTSC by copying the data to the LTSC's District file share, the data copied to the share will not be returned to you. Rather, data copied to the District file share will be deleted quickly—typically immediately after the data has been staged. In addition, all data the LTSC generates when processing hard copy documents or electronic data, *except data a District has requested be loaded into a hosting platform (i.e., Relativity or iCONNECT)*, will be removed from LTSC servers within 60 days of the fulfillment of your service request. Therefore, if you require modifications to an LTSC deliverable, it is imperative that you notify the LTSC as soon as possible, and in no event later than 60 days of the fulfillment of your request. If you do not make modification requests within 60 days, a modification request will not receive priority over the LTSC's current workload, and you will have to submit a new Preliminary Work Order, send the documents or electronic data to the LTSC again, and allow for the time needed for the LTSC to re-do all its prior processing work.

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(803) 705-5432

Czapko, Daniel (USAMN)

From: USALTSC-Coordiators
Sent: Monday, November 7, 2016 3:55 PM
To: Czapko, Daniel (USAMN); USALTSC-Coordiators
Cc: USAMN-Criminal ALS
Subject: Edward Adams : C1948W12092(Ref#:W12092_Remove from Taint) : Work Has Begun

LTSC

EOUSA Litigation Technology Service Center

1600 Hampton Street, Room 207 - Columbia, SC 29208

Work Has Begun on Work Order "C1948W12092(Ref#:W12092_Remove from Taint)" for Case Name: "Edward Adams"
Work Due On: 11/9/2016

To: Dan Czapko

The LTSC has received all containers as expected. We will be processing 1 container of type: "Electronic Folder." We will be applying a label to each container received.

Each Electronic Folder will be processed with "Relativity Folder Updates" and the following tasks will be performed:

- Coordinator Review and Assign
- Create Hosting Job
- Move Documents
- Tech QC of Deliverable
- Coordinator QC/Sign-off

LTSC RETENTION PRACTICES MANDATE PROMPT NOTIFICATIONS OF CHANGE REQUESTS:

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LTSC's current workload, and you will have to submit a new Preliminary Work Order, send the documents or electronic data to the LTSC again, and allow for the time needed for the LTSC to re-do all its prior processing work.

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(803) 705-5432

Czapko, Daniel (USAMN)

From: USALTSC-Coordinators
Sent: Monday, November 7, 2016 4:33 PM
To: Czapko, Daniel (USAMN); USALTSC-Coordinators
Cc: USAMN-Criminal ALS
Subject: Edward Adams : C1948W12092(Ref#:W12092_Remove from Taint) : Work Order Completed

LTSC

EOUSA Litigation Technology Service Center

1600 Hampton Street, Room 207 - Columbia, SC 29208

Work Order Completed

Dear Dan:

Your service request for LTSC processing, work order #C1948W12092(Ref#:W12092_Remove from Taint), has been fulfilled.

Please see the note below from Marc Fulkert, who invites your feedback on the work recently completed by LTSC ([click here](#) to complete the online feedback form and also feel free to contact me directly):

As the Litigation Technology Service Center COR, I would greatly appreciate any / all feedback so that we may continually improve our effort to meet the eDiscovery and document imaging needs of all USAOs going forward.

LTSC RETENTION PRACTICES MANDATE PROMPT NOTIFICATIONS OF CHANGE REQUESTS:

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documents or electronic data to the LTSC again, and allow for the time needed for the LTSC to re-do all its prior processing work.

-Marc

Marc Fulkert, LTSC Managing Attorney
Litigation Technology Service Center COR
Office of the Chief Information Officer
Executive Office for United States Attorneys
Desk: (803) 705-5422

Czapko, Daniel (USAMN)

From: Maria, David (USAMN) 1
Sent: Tuesday, February 28, 2017 10:54 AM
To: Czapko, Daniel (USAMN)
Subject: Adams Database

Dan,

We need to run one more set of search terms on the "Adams II" email database in Relativity. This should be the final set. These are our search terms to cull this down to relevant documents. Unlike the searches that we ran for potentially privileged documents, the docs that hit on these search terms should remain in the database, and those that don't should be excluded. Once you have run them, let me know, and I will do some spot checking based on certain documents that I have already pulled.

Here are the terms:

Apollo
Diamond
ADI
ADGC
Gemstone
DL
RL
ADR
RBE
ESA
MRM
Scio
SDTC
Krossbow
Linares
Lancia
Zipkin
Nichols
LisaL
LMAInc
Mack
Rapello
Platt
Robb
Larson
McMahon
Bern
McPheely

Let me know if you have any questions:.

Thanks,
David

David M. Maria
Assistant United States Attorney
District of Minnesota, Criminal Division
600 U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415
V: 612.664.5681 | F: 612.664.5787

Czapko, Daniel (USAMN)

From: USALTSC-Coordiators
Sent: Tuesday, April 4, 2017 11:33 AM
To: Czapko, Daniel (USAMN)
Subject: District Minnesota (USAMN), case "Edward Adams": LTSC Spec Sheet Received – NO ACTION REQUIRED

LTSC***EOUSA Litigation Technology Service Center***

1600 Hampton Street, Room 207 - Columbia, SC 29208

Edward Adams: LTSC Spec Sheet #6153 received and assigned to LAWTICS Work Order #13850

Thank you for your submission. We have received your Spec Sheet, and once we have analyzed your request we will send you an LWP as confirmation. A coordinator will reach out to you if we have any questions.

Spec Sheet Main Information

District	MN - Minnesota
District POC	Dan Czapko Daniel.Czapko@usdoj.gov 612-664-5790
AUSA POC	David Maria david.maria@usdoj.gov 612-664-5600
Case	Edward Adams (White Collar Crime)
Project Type	No Case Filed (pre-indictment or investigatory matter)
Court Type	Criminal
Conflict of Interest	Edward Adams, Michael Monahan
USAO Matter No	2014R00312
Deadline	4/7/2017 12:00:00 AM (Internal)
Customer Has	Search entitled "Adams Email Database" in the Edward Adams II sub-project.
Requested Deliverable	Please take everything that is NOT in the "Adams Email Database" search and put it in a folder that only I (Dan Czapko) have access to (similar to Taint Review). The prosecution team wants access to ONLY the documents that are in the "Adams Email Database" search.
Special Instructions	THIS IS IN THE EDWARD ADAMS II SUB-PROJECT

Relativity Administration Information

Refolder Edward Adams_II Please take everything that is NOT in the "Adams Email Database" search and put it in a folder that only I (Dan Czapko) have access to (similar to Taint Review). The prosecution team wants access to ONLY the documents that are in the "Adams Email Database" search.

Near Dupe Analysis: No

Email Thread Analysis: No

Content Analyst Index: No

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(803) 705-5432

Czapko, Daniel (USAMN)

From: USALTSC-Coordiators
Sent: Tuesday, April 4, 2017 1:11 PM
To: Czapko, Daniel (USAMN); USALTSC-Coordiators
Cc: USAMN-Criminal ALS
Subject: Edward Adams : C1948W13850 : LWP Approval Request – ACTION REQUIRED

Importance: High

LTSC

EOUSA Litigation Technology Service Center

1600 Hampton Street, Room 207 - Columbia, SC 29208

LTSC Litigation Work Plan Approval Request

Work Order: C1948W13850
Case Name: Edward Adams
Work Due On: 4/7/2017

To: Dan Czapko

Thank you for submitting a work request to EOUSA's Litigation Technology Service Center (LTSC). After reviewing your request, we ask your approval of the following proposed Litigation Work Plan (LWP).

Please read the following Summary of Work and Important Notices below **carefully**. The Summary of Work describes exactly how your Work Order will be fulfilled. Make sure that the Summary of Work is **accurate** and **complete**. Please also make sure you have read and understand the Important Notices below.

If you approve this LWP as it is written, please reply to this email and type "Approve" in the response.

If there is any change needed to this LWP as it is written, please reply to this email with updates needed in the response.

For LTSC Container #50412:

The LTSC will create a new secured folder named 'NOT_Adams Email Database'. Only members of the District Admin group will have permissions to this folder.

Documents in the results of saved search 'NOT_Adams Email Database' will be moved into the new secured folder.

Summary of Work

For work order "C1948W13850," we will be processing 1 container of the following type: "Electronic Folder." We will be applying a label to each container received.

1 Electronic Folder will be processed with "Relativity Folder Updates" and the following tasks will be performed:

- Coordinator Review and Assign
- Create New Secured Folder
- Move Documents
- Tech QC of Deliverable
- Coordinator QC/Sign-off

Jobs

Hosting Jobs

The following hosting jobs will be completed:

- W13850-24734: 0.00 GB consisting of 68940 docs, 0 pages, and 0 native files loaded to Relativity database "Edward Adams_II"

+++++

IMPORTANT NOTICES: READ BEFORE APPROVING

• **SECURE SHIPPING PROCEDURES:** Before you ship materials to the LTSC, please note that the LTSC requires strict compliance with the [Secure Shipping USAP, No. 3-13.200.005](#), and noncompliance may result in loss or damage to sensitive materials and require the filing of a formal Security Incident Report with your District Office Security Manager (DOSM) and others in accordance with the [LTSC USAP, No. 3-16.000.002 \(Part 6.B, "Project Security"\)](#). The Secure Shipping USAP mandates the use of either the new FedEx Secure Shipping Admin web portal or Registered Mail on all shipments of information protected from disclosure by law. Furthermore, such shipments must be packaged in accordance with the Secure Shipping USAP's dual-container requirements – using the special secure shipping tape/labels identified in USAP Attachment 1 as appropriate – and you must provide the LTSC with your shipment's tracking number(s) prior to shipping your materials. Also note that Electronically Stored Information (ESI) must be copied and encrypted per the LTSC USAP before shipment (do not send original ESI). Please contact your LTSC Project Coordinator for more information, and carefully review the [LTSC Shipping Requirements](#) for tips regarding how to securely ship your materials.

• **HARD COPY REASSEMBLY:** For projects involving the scanning of hard copy documents, the LTSC provides "physical unitization" services by inserting prep sheets : (1) where there are physical breaks among materials (e.g., staples, clips, rubber bands, etc); or (2) pursuant to clearly specified box/folder instructions from the District. Upon completion, documents will be returned to the folder/binder/etc from which they were removed, but staples, clips, rubber bands, etc. will not be reapplied. Rather, color-coded prep sheets will be included within the returned documents, and the prep sheets will contain markings evidencing the type of fastener that the LTSC removed.

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(803) 705-5432

Czapko, Daniel (USAMN)

From: Czapko, Daniel (USAMN)
Sent: Tuesday, April 4, 2017 1:30 PM
To: USAMN-Criminal ALS; Harris, Martin 3 (USAMN)
Subject: Job # 000833 - ASSIGNED

I will get this.
Danh

Job # 000833 Due Date: 4/6/2017 Assigned To: DCZAPKO

Eclipse project for Edward Adams 4_11_2017 is ready for Production...please note that "Page Tags" have been used to exclude "Do Not Disclose" pages from documents in the project.

Thank you.

Czapko, Daniel (USAMN)

From: Czapko, Daniel (USAMN)
Sent: Tuesday, April 4, 2017 1:50 PM
To: USALTSC-Coordinators
Cc: USAMN-Criminal ALS
Subject: RE: Edward Adams : C1948W13850 : LWP Approval Request – ACTION REQUIRED

Approve.

Dan Czapko

From: USALTSC-Coordinators
Sent: Tuesday, April 4, 2017 1:11 PM
To: Czapko, Daniel (USAMN) <dczapko@usa.doj.gov>; USALTSC-Coordinators <USALTSC-Coordinators@usa.doj.gov>
Cc: USAMN-Criminal ALS <USAMN.CriminalALS@usa.doj.gov>
Subject: Edward Adams : C1948W13850 : LWP Approval Request – ACTION REQUIRED
Importance: High

LTSC

EOUSA Litigation Technology Service Center

1600 Hampton Street, Room 207 - Columbia, SC 29208

LTSC Litigation Work Plan Approval Request

Work Order: C1948W13850
Case Name: Edward Adams
Work Due On: 4/7/2017

To: Dan Czapko

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(803) 705-5432

Czapko, Daniel (USAMN)

From: USALTSC-Coordinators
Sent: Tuesday, April 4, 2017 3:00 PM
To: Czapko, Daniel (USAMN); USALTSC-Coordinators
Cc: USAMN-Criminal ALS
Subject: Edward Adams : C1948W13850 : Work Has Begun

LTSC

EOUSA Litigation Technology Service Center

1600 Hampton Street, Room 207 - Columbia, SC 29208

Work Has Begun on Work Order "C1948W13850" for Case Name: "Edward Adams"
Work Due On: 4/7/2017

To: Dan Czapko

The LTSC has received all containers as expected. We will be processing 1 container of type: "Electronic Folder." We will be applying a label to each container received.

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- Tech QC of Deliverable
- Coordinator QC/Sign-off

LTSC RETENTION PRACTICES MANDATE PROMPT NOTIFICATIONS OF CHANGE

REQUESTS: The LTSC retains only temporarily the documents and electronic data that Districts provide to the LTSC, as well as the electronic data that the LTSC generates in connection with processing those materials. As a result, if you require modifications to an LTSC deliverable, you must make the modification request as soon as possible, and in no event later than 60 days of the fulfillment of your request. If you send the LTSC hard copy documents, the LTSC will return those documents to you. If you provide the LTSC electronic data on physical storage media (e.g., hard drives, CDs, etc.), the LTSC will return that physical storage media (with the data) to you. If you provide electronic data to the LTSC by copying the data to the LTSC's District file share, the data copied to the share will not be returned to you. Rather, data copied to the District file share will be deleted quickly—typically immediately after the data has been staged. In addition, all data the LTSC generates when processing hard copy documents or electronic data, *except data a District has requested be loaded into a hosting platform (i.e., Relativity or iCONNECT)*, will be removed from LTSC servers within 60 days of the fulfillment of your service request. Therefore, if you require modifications to an LTSC deliverable, it is imperative that you notify the LTSC as soon as possible, and in no event later than 60 days of the fulfillment of your request. If you do not make modification requests within 60 days, a modification request will not receive priority over the LTSC's current workload, and you will have to submit a new Preliminary Work Order, send the

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(803) 705-5432

Czapko, Daniel (USAMN)

From: USALTSC-Coordinators
Sent: Tuesday, April 4, 2017 3:17 PM
To: Czapko, Daniel (USAMN); USALTSC-Coordinators
Cc: USAMN-Criminal ALS
Subject: Edward Adams : C1948W13850 : Work Order Completed

LTSC

EOUSA Litigation Technology Service Center

1600 Hampton Street, Room 207 - Columbia, SC 29208

Work Order Completed

Dear Dan:

Your service request for LTSC processing, work order #C1948W13850, has been fulfilled.

Please see the note below from Marc Fulkert, who invites your feedback on the work recently completed by LTSC ([click here](#) to complete the online feedback form and also feel free to contact me directly):

As the Litigation Technology Service Center COR, I would greatly appreciate any / all feedback so that we may continually improve our effort to meet the eDiscovery and document imaging needs of all USAOs going forward.

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-Marc

Marc Fulkert, LTSC Managing Attorney
Litigation Technology Service Center COR
Office of the Chief Information Officer
Executive Office for United States Attorneys
Desk: (803) 705-5422

Czapko, Daniel (USAMN)

From: Czapko, Daniel (USAMN)
Sent: Tuesday, April 4, 2017 3:46 PM
To: USAMN-Criminal ALS; Harris, Martin 3 (USAMN)
Cc: O'Reilly, Sara (USAMN)
Subject: Job # 000808 - ASSIGNED

These are in, starting at 00042751

Dan

Job # 000808 Due Date: 4/3/2017 Assigned To: DCZAPKO

R:\Maria_David\ADAMS_EDWARD_ETAL_2014R00312\Grand Jury\Grand Jury Subpoenas\GJ responses

Dan,

Please add to Eclipse project: Folders, Exterior Design Studio LTD, Fidelity, Plekkenpol Builders, TranUnion

Thank you.

Czapko, Daniel (USAMN)

From: Czapko, Daniel (USAMN)
Sent: Tuesday, April 4, 2017 4:03 PM
To: Maria, David (USAMN) 1
Cc: Harris, Martin 3 (USAMN)
Subject: Job # 000831 - COMPLETED

The Adams' Relativity project is ready. Let me know if anything doesn't look right.

Thanks,
Dan

Job # 000831 Due Date: 4/6/2017 Assigned To: DCZAPKO

In Relativity - Edward Adams II

Make items in Adams Email Database search accessible for team to search. Put items NOT in search in folder that team does not have access to.